

# Core Strategy - Submission Version - Volume Two

Huntingdonshire District Council | Core Strategy - Submission Version - Volume Two

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## Introduction

### Introduction to the Submission Plan

The Submission Core Strategy has been set out in two volumes. Volume 1 is the draft Plan with policies and their reasoned justification. Volume 2 sets out the process of how the final approach was decided upon. The information in volume 2 therefore forms the evidence base and the audit trail for the development of the Submission Core Strategy.

Each topic addressed in this volume is set out in a standard format as described below.

Heading	Description
Key sources	A table setting out the key policy sources which have guided the approach taken.
Core Strategy Issues and Options	A statement setting out the issues, options and questions raised previously in the main Issues and Options consultation document.
Reasonable Alternatives	Any alternatives put forward in the main Issues and Options consultation document which the Council considered could be a feasible alternative way of approaching the topic.
Summary of Initial Sustainability Appraisal on Issues and Options	An Initial Sustainability Appraisal was undertaken of the main Issues and Options consultation document and distributed for consultation alongside it. This is the first stage of a systematic process intended to assess the extent to which emerging policies and proposals will help to achieve relevant environmental, social and economic objectives.
Consultation Responses to Issues and Options	The main Issues and Options consultation document was extensively distributed to specific and general consultation bodies <sup>(1)</sup> and to other interested parties. A summary of the responses is given including an indication of overall levels of support or opposition to the issues and options raised.
Further Options Consultation (Towards a Spatial Strategy)	Once responses had been received to the broad issues and options raised more detailed consultation material was produced concerning the spatial vision, spatial strategy and strategic growth options. These were also informed by the Strategic Housing Land Availability Assessment (SHLAA) and the Employment Land Review, prepared in consultation with landowners and agents. This material was then used to engage a number of key stakeholders, including parish and county councils, highways and environment agencies and key service providers, in further consultation.
Initial Sustainability Appraisal on Towards a Spatial Strategy	An Initial Sustainability Appraisal was undertaken of 'Towards a Spatial Strategy' to assist in selection of the preferred approaches.
Key Stakeholder Responses	Responses received to the detailed options presented in Towards a Spatial Strategy.

1 As defined in the Town and Country Planning (Local Development) (England) Regulations 2004

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Assessment of Responses and Alternative Approaches	The Council's consideration of responses received including an analysis of any alternative approaches suggested by the Council or raised through the consultation process.
Core Strategy Preferred Options	A statement setting out the Preferred Option for the approach to be taken.
Reasonable Alternatives	Any alternatives put forward in the Preferred Options consultation document which the Council considered could be a feasible alternative way of approaching the topic.
Summary of the draft Final Sustainability Appraisal	A draft Final Sustainability Appraisal was undertaken of the Preferred Options consultation document and distributed for consultation alongside it. This is the second stage of a systematic process intended to assess the extent to which emerging policies and proposals will help to achieve relevant environmental, social and economic objectives.
Summary of Appropriate Assessment	Habitats Regulations Assessment has been completed of the preferred options document and revised to take account of changes made for the submission version.
Consultation Responses	The Preferred Options document was made widely available for consultation. A summary of the responses is given including an indication of overall levels of support or opposition to the Preferred Options put forward.
Assessment of Responses and Alternative Approaches	The Council's consideration of responses received at the Preferred Options stage including an analysis of any alternative approaches suggested by the Council or raised through the consultation process. Where appropriate in response to representations further assessment of alternative approaches has been given.
Changes made	A summary of the changes made between the Preferred Options document and the Submission document.
Tests of Soundness	Throughout the preparation of material relating to each topic attention has been paid to the need to adhere to the requirements of the tests relating to procedures, conformity and coherence, consistency and effectiveness. All the preferred options presented are believed to be sound. Where aspects of concern were identified in the course of preparing the preferred options these are highlighted and the remedial action taken noted. Added to this section are the responses from GO East where potential problems with meeting the tests of soundness were identified in their representations on the Preferred Options. Detail of the action taken to mitigate these issues is also included.
Approach Taken	Statement cross-referring to the location of the relevant approach taken in Volume 1.

One of the central assessments that will be made of any DPD at the Submission stage is whether the document passes the Tests of Soundness. To ensure that the document can pass the tests at Submission the Preferred Options have been assessed and modified where appropriate.

The Tests of Soundness are as follows:

Procedural

- i. It has been prepared in accordance with the local development scheme;
- ii. It has been prepared in compliance with the statement of community involvement, or with the minimum requirements set out in the Regulations where no statement of community involvement exists;
- iii. The plan and its policies have been subjected to sustainability appraisal;

## Conformity

- iv. It is a spatial plan which is consistent with national planning policy and in general conformity with the regional spatial strategy for the region and it has properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas;
- v. It has had regard to the authority's community strategy;

## Coherence, consistency and effectiveness

- vi. The strategies or policies in the plan are coherent and consistent within and between development plan documents prepared by the authority and by neighbouring authorities, where cross boundary issues are relevant;
- vii. The strategies or policies represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base;
- viii. There are clear mechanisms for implementation and monitoring; and
- ix. The plan is reasonably flexible to enable it to deal with changing circumstances.

Of these, tests i) to iii) are tested for the Core Strategy as a whole. For test i) the Core Strategy is identified in the Local Development Scheme March 2007. However, preparation of the Core Strategy actually began under the LDS of March 2006 after which major revisions were required which affected the timeframe and required the adoption of a new LDS. The LDS March 2007 proposed preparation of the Core Strategy between mid 2007 and 2008 with Submission to the Secretary of State timetabled for spring 2008. Due to limited staff resources and the additional phase of Issues and Options consultation with key stakeholders the time table has been particularly challenging and it was decided to delay submission until July. The additional stage of Issues and Options consultation was carried out in order to consider further particular issues that were raised from the consultation process. The consultation document Towards a Spatial Strategy for Huntingdonshire therefore focused on the vision, spatial strategy and other strategic issues, namely the policy for Gypsies, Travellers and Travelling Showpeople. Responses to Towards a Spatial Strategy informed preparation of the Preferred Options Report and meant that the plan was more responsive to local issues raised by local people.

The Council has been advised by Go-East not to revise the LDS in advance of new Regulations being published. A new LDS will be published in due course.

The Statement of Community Involvement (SCI) was adopted in November 2006. The Core Strategy has been prepared in line with the SCI and therefore meets test ii).

Test iii) has been met as demonstrated by the inclusion of summaries from the Initial Sustainability Appraisal of Issues and Options consultation, including Towards a Spatial Strategy for Huntingdonshire and the draft Final Sustainability Appraisal.

The Core Strategy is a spatial plan and each policy is in conformity with the East of England Plan. At all stages of plan development the Community Strategy and emerging Sustainable Community Strategy has been taken into account. More information on how this has been achieved can be found in the Core Strategy DPD Soundness Self-Assessment. It can therefore be demonstrated that the plan meets conformity tests iv) and v).

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In terms of tests for coherence, consistency and effectiveness tests vi) and viii) are the most straightforward. As the Core Strategy is the first Development Plan Document (DPD) to be produced and the central strategy for the LDF there are no other DPDs with which to be consistent at this stage. It will be more important for subsequent DPDs to be consistent with the Core Strategy. There is a clear interaction between all the policy areas in the Core Strategy and in particular those of the Spatial Strategy. Where applicable aspects of concern have been highlighted and the remedial action that has been taken in order to maintain coherency and consistency between policy areas is noted. Test vi) is therefore considered to be met. The inclusion of the Implementation and Monitoring chapter satisfies test viii).

Tests vii) and ix) are more subjective than the others. The Council believes that these tests are met by the Core Strategy Submission document. This volume details the consideration of alternatives and the evidence base that was used in selection of the draft Plan as submitted. In selection of the Submission Approaches the best way forward needs to incorporate flexibility and be capable of dealing with changing circumstances. Again, where applicable, aspects of concern have been highlighted and the remedial action that has been taken in order to maintain flexibility is noted in the relevant sections of this document.

## Habitats Regulations Assessment

A Habitats Regulations Assessment (HRA) is required by the European Directive on Habitats and has been carried out on the Preferred Options Core Strategy by consultants Scott Wilson. The Screening Assessment of the HRA identified that an Appropriate Assessment (AA) was required and this was also carried out by Scott Wilson. The consultants have taken into account the changes made for the submission Core Strategy in their HRA and AA and have made recommendations to mitigate potential effects on the European sites listed in the assessment.

Scott Wilson was appointed by the District Council to carry out a Habitats Regulation Assessment (HRA) for the Preferred Options Core Strategy in November 2007. The HRA tests the impacts of a plan on Natura 2000 which include Special Protection Areas (SPA) for birds and Special Areas of Conservation (SAC) for species and habitats. The HRA also covers Ramsar wetland sites and European marine sites. Natura 2000 sites (SACs and SPAs) are identified and protected against development through "appropriate assessment" under the Directive on Conservation of Natural Habitats and of Wild Fauna and Flora 92/43/EEC (the "Habitats Directive").

Prior to carrying out the HRA, Scott Wilson gathered information on relevant European sites, their conservation objectives and other relevant plans or projects which may affect these sites in combination with the Council's Core Strategy. In total, eight sites were identified that could be affected by the Core Strategy either on its own or in combination with other plans or projects. These sites were:

- Portholme SAC
- Fenland SAC
- Ouse Washes SAC/SPA and Ramsar
- Orton Pit SAC
- Rutland Water SPA
- Eversden and Wimpole Woods SAC
- Barnack Hills and Holes SAC
- Nene Washes SPA

Scott Wilson then carried out the screening assessment which assessed the individual policies of the Core Strategy against the conservation objectives for each site. It was possible to 'screen out' any potential significant effects of the plan on Eversden and Wimpole Woods SAC and Barnack Hills and Holes SAC. Similarly, policies within the Core Strategy that did not promote or govern the distribution of development were able to be screened out.

Those remaining policies relating to Spatial Planning Areas, Settlement Hierarchy, Employment, Retail and Infrastructure Requirements were carried forward into the screening assessment and, where applicable, to the Appropriate Assessment stage.

It was concluded that the plan could have significant effects on recreational pressure for Portholme, Rutland Water and Orton Pit and the plan could impact upon water resources and quality. The AA therefore suggested a number of mitigation measures which focused on phasing of development and associated infrastructure such as open space and water treatment and resource infrastructure. These recommendations have been incorporated into the plan as part of the monitoring proposals. More detail on the AA process and the results is given throughout this document in the relevant sections.

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## The Spatial Vision

### A Spatial Vision for Huntingdonshire

**Table 2 Key Sources for the Spatial Vision**

National	<p>PPS1: Delivering Sustainable Development                  PPS1 Supplement: Planning and Climate Change                  PPS3: Housing                  Consultation paper on PPS4 Planning for Sustainable Economic Development                  PPS6: Planning for Town Centres                  PPS7: Sustainable Development in Rural Areas,                  Securing the Future - Delivering UK Government Sustainable Development Strategy (HM Government) 2005</p>
Regional	<p>East of England Plan                  Green Infrastructure Strategy for the Cambridge Sub-Region (2006),                  Cambridgeshire Biodiversity Action Plan (2004)</p>
Local	<p>Huntingdonshire Community Strategy (2004)                  Sustainable Community Strategy for Huntingdonshire (2008)                  Housing Land Availability Study (HLAS) (2007) updated and adapted to form the Strategic                  Housing Land Availability Assessment (SHLAA) (2008)                  Settlement Hierarchy Background Paper Update (2007)                  The Employment Land Review (2008)                  Huntingdonshire Retail Assessment Study (2005) and Update (2007)                  Huntingdonshire Strategic Flood Risk Assessment (2004)</p>

### Core Strategy Issues and Options

#### Issues and Options identified for Consultation

Issue 1: The need to define a vision for Huntingdonshire to guide the overall philosophy of the Core Strategy.

Option 1: Use the vision from the Huntingdonshire Community Strategy:

'Huntingdonshire will continue to provide a good quality of life as a place which offers:

- continued economic success;
- opportunities for everyone to gain access to suitable homes, jobs and services; and
- an attractive environment which is conserved and enhanced.'

Question 1: Do you consider this an appropriate vision for the District?

Question 2: Are there other aspects it should incorporate?

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## Reasonable Alternatives

.1 No alternatives were put forward.

## Summary of Initial Sustainability Appraisal on Issues and Options

.2 The vision was not appraised separately as it was derived directly from the Community Strategy which aims to promote sustainability across the District as a whole.

## Consultation Responses to Issues and Options

.3 The majority of respondents supported the vision. However, there was some concern that it was not sufficiently locally distinctive. A number of respondents sought additions to the vision. These included increasing the emphasis on sustainable development and the need to reduce the carbon footprint of the District. The Vision was considered to not be specific enough to the character of Huntingdonshire and the issues and challenges faced over the plan period. One respondent was particularly concerned that the RSS vision for sustainable and inclusive communities be included, along with the vision from the Community Strategy.

## Further Options Consultation

### Towards a Spatial Strategy

The Vision put forward was:

In 2026, Huntingdonshire will have retained its distinct identity as a predominantly rural area of villages and market towns whilst accommodating the development for the homes and jobs required as part of a major growth area, taking advantage of the economic vitality of the Cambridge Sub-Region, in a sustainable manner which respects, maintains and enhances the special characters of its towns, villages and countryside. Its residents will have an improved quality of life with increased access to local jobs, housing and high quality services, facilities and green infrastructure.

Question 1: It is considered that this vision captures all the required aspects and that it is not possible to present alternative visions. Do you agree that this vision adequately covers all aspects? If not please give details of how you think it could be changed.

### Towards a Spatial Strategy

The Council was concerned that to include a substantial amount of spatial detail in the Vision would make the Vision cumbersome and would take it away from the high level succinct statement that it should be. To tackle the requirement for more spatial detail the Council decided that it would draw up a set of Spatial Principles that would give more information about the way in which the Council thought the issues and challenges that the District should be faced in the plan period.

The Spatial Principles identified were:

Huntingdonshire will play a proactive role in accommodating future growth in the Cambridge-sub region. The majority of growth will be concentrated in the most sustainable locations of Huntingdon, St Neots and St Ives where there is access to existing and improving public transport, new road infrastructure and where the use of amenities and facilities can be maximised.

RAF Brampton and the industrial estate west of Huntingdon town centre will provide significant opportunities for development on previously developed land within the District. Further opportunities to maximise the use of previously developed land on a smaller scale will be encouraged within the market towns of the Cambridge-Sub region.

The visual quality, viability and vitality of the four market town centres in Huntingdonshire will be enhanced by identifying and implementing opportunities to improve the public realm. Improvements to the public realm will focus on improving the quality of place and culture in our market towns to ensure the District remains a popular location for visitors. The regeneration of run down areas will be encouraged and particular attention will be paid to areas of deprivation within St Neots, Huntingdon and Ramsey through neighbourhood management and regeneration projects.

Opportunities for retail growth will be maximised within all market towns and key service centres in order to respond to competitive pressure from other centres and further strengthen the District's economy. A large proportion of future retail growth will be accommodated within the town centre of Huntingdon, with additional, complementary development to the west of the town centre facilitated through an Area Action Plan. Further growth will be accommodated in St Neots and a lesser scale of growth in St Ives and Ramsey.

Future employment development will be located in the most sustainable locations at the market towns and will be commensurate with housing growth to ensure the creation of balanced communities. The provision of local employment opportunities will help limit levels of out commuting to London, Peterborough and Cambridge and ensure the continued success of the District's economy.

Growth of key service centres will be restricted to a level that will help sustain the existing facilities and amenities, without encouraging growth in these less sustainable locations. In smaller settlements future housing will be restricted to only that necessary to meet local housing needs. This will be achieved through the identification of exception sites for affordable housing in those settlements with access to higher order centres.

The further expansion of Peterborough will respect the separate identities of Yaxley, Facet, Stilton and Alwalton by maintaining an appropriate degree of green separation. However, it is important to ensure those settlements that have experienced significant growth in the past enjoy the benefits of future of development within Peterborough through improved access to a greater range of amenities and facilities. The areas of greenspace around those settlements close to the boundary of Peterborough will become important areas of open space resource for the expansion of Peterborough.

The landscape and countryside of the Huntingdonshire will be protected and enhanced. Areas identified for enhancement include the wetlands along the Ouse Valley, the woodlands around Grafham Water, the wetland and woodlands that will form the Great Fen area and the limestone villages of the north west and the uplands in the west of the District. The accessibility for informal recreation these areas will be improved. Further opportunities for recreation and biodiversity/green infrastructure across the District will be identified and improved. The growth of both Huntingdon and St Neots will reinforce the need to protect and enhance areas of greenspace around them.

The proposed improvements to the new A14 may create significant opportunities for new development in the Huntingdon area. It could help solve the access problems in the town centre and facilitate the extension of the town centre in a westerly direction through the means of an Area Action Plan. Improvements to the transport network will influence the delivery of housing and employment growth in more sustainable locations, projects with particular importance in relation to delivery of development include the A14 improvement

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scheme, the Cambridge to St Ives Guided Bus and the A428 road improvements and High Quality Public Transport Corridor. Further improvements to public transport will enable the promotion of sustainable travel options for the District.

The redundant military bases in Huntingdonshire will need careful consideration to ensure that any potential re-use or redevelopment maximises the benefit to the District. RAF Brampton, subject to its release by the MoD, offers the opportunity for mixed use development of an appropriate scale in a sustainable location within the plan period. Whilst the future potential for developments at Alconbury Airfield and Wyton Airfield need to be considered in the longer term in the context of the economic benefits they may bring to Huntingdonshire, if no sequentially better sustainable options are available and also in the context of the wider strategic needs of the Region through the next review of the East of England Plan.

## Summary of Initial Sustainability Appraisal on Towards a Spatial Strategy

.4 The Spatial Vision meets the majority of the SA Objectives and is considered to be well balanced in meeting the need to promote sustainable development. Specific commitments to accommodating growth in a sustainable manner and taking advantage of economic vitality is balanced against the need to protect the landscape character and ecology of the District.

.5 The sustainability appraisal process found that the Principles met the majority of the sustainability appraisal objectives. However, there were some omissions, for example, no reference to managing flood risk - identified as a key sustainability issue for the District in the Scoping Report - or reducing crime. The appraisal suggested that these issues may need to be considered for the later stages of plan development.

## Key Stakeholders' Responses

.6 Most key stakeholder respondents considered the vision to be appropriate and more locally specific than previous versions. Some thought that it could still be more locally specific and make reference to growth that would take place and where. Some also considered that it was important to stress that proposed growth is to be delivered in a sustainable manner and to do so appropriate solutions would need to be developed. These would involve addressing additional environmental pressures on water supply, waste disposal facilities, greenhouse gas emissions, biodiversity and flood risk. An integrated approach to the development of Huntingdonshire should also be emphasised, reflecting the need for different forms of environmental infrastructure.

.7 Nine of the 17 respondents supported the Spatial Principles as presented. The main areas of concern raised by other respondents were how the Spatial Principles fitted with the Spatial Vision, greater clarity was sought on the future roles of RAF bases in the District and additions were sought to address building standards, locational and infrastructure issues.

## Assessment of Responses and Alternative Approaches

.8 The original option has been discounted because it is considered that it does not respond to the key characteristics of the District, the issues and challenges, raised through consultation on the LDF, in an appropriate manner. It is considered that the links with the vision of the East of England Plan are not sufficiently clear. It is also considered to be "placeless" and not sufficiently distinctive to Huntingdonshire.

.9 The Vision presented in the 'Towards a Spatial Strategy' document required modification following respondents' comments regarding its readability. The Spatial Principles support the Vision giving more detail about the issues and challenges Huntingdonshire faces during the plan period and how the Council proposes to tackle them. The lack of spatial detail is acknowledged and the Spatial Principles have been supplemented to address this.

.10 The need for greater clarity on the spatial distribution of development and how strategic infrastructure projects would influence the strategy is accepted. Clarification is also required regarding the role military bases would have in the Spatial Strategy.

.11 Concerns raised through the Sustainability Appraisal regarding flooding and crime have been addressed through the spatial objectives where this level of detail is considered more appropriate.

## Core Strategy Preferred Options

### Spatial Vision put forward for participation on preferred options

In 2026, Huntingdonshire will have retained its distinct identity as a predominantly rural area of villages and market towns whilst accommodating the development for the homes and jobs required as part of a major growth area. It will have taken advantage of the economic vitality of the Cambridge Sub-Region, in a sustainable manner while respecting, maintaining and enhancing the special characters of its towns, villages and countryside. Its residents will have an improved quality of life with improved access to a wider range of local jobs, housing and high quality services, facilities and green infrastructure.

### Spatial Principles put Forward for Participation on Preferred Options

Huntingdonshire will play a proactive role in accommodating future growth in the Cambridge-sub region. The majority of growth will be concentrated in the most sustainable locations of Huntingdon, St Neots and St Ives where there is access to existing and improving public transport, new road infrastructure and where the use of amenities and facilities can be maximised.

RAF Brampton and the industrial area west of Huntingdon town centre will provide significant opportunities for development on previously developed land within the District. Further opportunities to maximise the use of previously developed land on a smaller scale will be encouraged within the market towns of the Cambridge-Sub region.

The visual quality, viability and vitality of the four market town centres in Huntingdonshire will be enhanced by identifying and implementing appropriate development opportunities and opportunities to improve the public realm. Improvements to the public realm, improving the quality of both place and culture, will encourage local people to use local facilities and will attract visitors.

The regeneration of run down areas will be encouraged with particular attention paid to areas of deprivation within St Neots, Huntingdon and Ramsey through neighbourhood management and regeneration projects.

Opportunities for retail growth will be encouraged within all market towns and in larger villages which are identified as key service centres in order to respond to competitive pressure from other centres and further strengthen the District's economy. A large proportion of future retail growth will be accommodated within the

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town centre of Huntingdon, with additional, complementary development to the west of the town centre facilitated through an Area Action Plan. Further growth will be accommodated in St Neots where a large scale urban extension to the east of the town will require a district centre which will complement the town centre. There will be a lesser scale of growth in St Ives and Ramsey.

Future employment development will mostly be located in the most sustainable locations of the market towns and will be commensurate with housing growth to ensure the creation of balanced communities. The provision of a wider range of local employment opportunities will help limit levels of out commuting to London, Peterborough and Cambridge and ensure the continued success of the District's economy.

Development in most of the key service centres outside the Spatial Planning Areas will be restricted to a level that will help sustain the existing facilities and amenities, without encouraging growth in these less sustainable locations. In smaller settlements future housing will be restricted to small scale development and that necessary to meet local housing needs.

The further expansion of Peterborough will respect the separate identities of Yaxley, Facet, Folksworth, Stilton and Alwalton by maintaining green separation. However, it is important to ensure those settlements enjoy the benefits of future of development within Peterborough through improved access to a greater range of amenities and facilities. The areas of greenspace around those settlements close to the boundary with Peterborough will also be important areas of open space resource for the expanded population of Peterborough.

The landscape and countryside of Huntingdonshire will be protected and enhanced. Areas identified for enhancement include the Ouse Valley from St Neots to Earith, the woodlands around Grafham Water and Brampton and the wetland and woodlands of the Great Fen Project. These areas will also have improved access for informal recreation. Further opportunities for improved recreation and biodiversity/green infrastructure will be identified. The growth in the Huntingdon and St Neots areas will reinforce the need to protect and enhance areas of greenspace around them.

The A14 improvements will create significant opportunities for new development in the Huntingdon area. The changes will improve access problems to the town centre and facilitate the extension of the town centre in a westerly direction. Other improvements to the transport network will also influence the delivery of housing and employment growth in more sustainable locations. Projects with particular importance include the Cambridge to St Ives Guided Bus, the A428 road improvements and High Quality Public Transport Corridor and the A15 improvements at Hampton near Peterborough. Improvements in public transport will enable the promotion of sustainable travel options.

Any redundant military bases in Huntingdonshire will need careful consideration to ensure that any potential re-use or redevelopment maximises the economic benefit to the District. RAF Brampton, subject to its release by the MoD, offers the opportunity for mixed use development on an appropriate scale in a sustainable location within the plan period. The future potential of Alconbury Airfield and Wyton Airfield will need to be considered in the longer term as part of the next review of the Regional Spatial Strategy. That review will need to take into account wider strategic issues for the region and the range of sustainable options available.

## Reasonable Alternatives

**.12** Consultation responses for Preferred Options indicated that the Spatial Vision could be significantly improved. A number of respondents suggested that the Spatial Vision was not locally specific and did not give a clear articulation of where growth is proposed and many respondents suggested incorporating elements of the Spatial Principles. The reasonable alternative assessed below looks at ways in which the Spatial Vision can be strengthened.

.13 As a result of consultation the following reasonable alternatives have been identified:

- Incorporating elements of Spatial Principles into the Spatial Vision
- Deleting the Spatial Principles altogether

## Summary of Draft Final Sustainability Appraisal

.14 The spatial vision and spatial principles are sustainable and reflect local context. They set out the key challenges posed to the District and the opportunities that may arise in the period up to 2026 and sets out a sustainable way in which to accommodate the growth whilst protecting and enhancing the District's landscape character and ecology. The economic opportunities arising from growth are identified. However, no reference is made to the need to manage flood risk, the need to improve cycle routes, footpaths and bridleways, promote renewable technologies, reduce waste and encourage recycling and reduce crime.

.15 The Spatial Principles are strongly sustainable in the protection of the natural and built environment and will contribute to other objectives of creating more sustainable communities. However, social cohesion is mentioned only in brief without any supporting statement as to how this should be achieved and no mention is given to promoting economic growth. The difference in assessment relates to the extent they directly quote or are linked to the objective. The Spatial Principles are therefore explicitly sustainable in the majority of areas – specifically those relating to environmental objectives however, is less so in terms of social or economic objectives, some of which are not explicitly referenced.

.16 It was suggested that consideration be given to ensuring criteria relating to social and economic objectives are more explicit, reflecting the wording of the SA objectives to ensure that there is more consistency which better reflect the three areas of sustainable development.

## Consultation Responses

.17 Approximately 57% of respondents explicitly objected to the proposed spatial vision. The main concern arose from the vision not being spatially specific and not setting out where growth will be. One respondent was unclear about the meaning of some of the words in the vision suggesting that the terms "economic vitality" and "sustainable manner" were ambiguous. It was suggested that, in order to improve the vision and make it more spatially specific, elements of the Spatial Principles could be incorporated. Other respondents also suggested that greater emphasis on the historic environment and biodiversity and sport and recreation should be included. Of those who supported the spatial vision respondents were pleased that the protection of the District's identity and character of its settlements was highlighted.

.18 The Spatial Principles generated the most responses in this particular chapter with 73 people commenting on them. Of these 73 responses, 41 stated that they opposed the Spatial Principles. It is clear from the responses that people do not fully understand the relationship between the Spatial Principles and Spatial Vision or indeed understand the purpose of the Spatial Principles. As with the comments on the Spatial Vision it was suggested that some of the Spatial Principles be incorporated into the Spatial Vision. It was considered that more information on timing of major infrastructure developments (such as the A14) needs to be given and that there should be a specific principle relating to biodiversity. It was also highlighted by a number of respondents that insufficient detail on the development of Ramsey had been included. A number of respondents also objected to the restrictions placed on Key Service Centres, suggesting that more growth is needed in these settlements in order to sustain the rural economy. The issue of airfields was also raised with one respondent suggesting that redundant airfields should be given preference over Greenfield land and that the future of Alconbury should not await the RSS review. The fact that the Principles did not mention RAF Upwood was also raised. Another respondent suggested that

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the Council's intentions for redundant airfields should be made clearer. A number of respondents also identified that the Council had not had proper regard to PPS1 Climate Change and that insufficient emphasis on the need to manage and minimise flood risk in line with PPS25 has been given.

## Assessment of Responses and Alternative Approaches

A number of respondents clearly objected to the Council's preferred Spatial Vision. Concerns focused on its lack of spatial specificity and not setting out where growth will go. Furthermore, other respondents suggested that additions could be included to improve the Spatial Vision.

It is important to have a Spatial Vision in order to set out the Council's aspirations of the future development for the District. It is closely linked to the objectives which form the basis for monitoring implementation of the policies in the Core Strategy. Therefore, not including a Spatial Vision is not a reasonable alternative. Although the Council did consider the preferred Spatial Vision to be adequate in terms of clearly setting out the future development of the District, following consultation on preferred options it is recognised that the Spatial Vision needs significant amendment to address the concerns raised by some respondents. The changes made are set out below.

Responses clearly identified that there was widespread confusion as to how the Spatial Principles fit with the rest of the Core Strategy, particularly the Spatial Vision.

Including elements of the Spatial Principles would ensure that the Spatial Vision is locally distinctive and spatially specific. However, the Council had previously considered that incorporating all of the Spatial Principles into the Spatial Vision would make it too lengthy. It is however considered necessary to respond to the issues raised through preferred options consultation and make the Vision more spatially specific by incorporating those elements of the Spatial Principles which clearly articulate the Council's Spatial Strategy.

The Spatial Principles were included in order to give further detail on the spatial elements of the Council's Vision. It is therefore considered inappropriate to delete them entirely as this would lose the specificity and distinctiveness that needs to be included in the Vision.

The Spatial Principles respond to the challenges identified in the planning context and seek to enhance the District's identity as outlined in the Spatial Portrait. It is therefore important that they are included in some form within the plan.

## Changes Made

The Council has responded to issues raised through consultation by significantly restructuring the Spatial Vision. Spatially specific elements of the Spatial Principles have been added. The Spatial Principles that have been included and amended where necessary are set out in the Changes made for Spatial Principles of this volume. The decision on which principles to incorporate centred on the responses to consultation and looked at those principles that best articulated the Council's spatial strategy. Details of where growth will be focused have also been added to give a broad scenario of the District's intended character in 2026. In order to more fully reflect the spatial strategy it has also been decided to move the key diagram from the end of Volume 1 (p. 31) to the beginning of chapter 6 which sets out the Council's spatial strategy.

The Spatial Principles are no longer included as a separate section. Elements have been incorporated into the Spatial Vision as follows in order to more clearly articulate and more closely link to the Council's Spatial Strategy.



Parts of paragraph 5.34 of the Preferred Spatial Principles have been included and strengthened to include reference to the urban extension east of St Neots which will accommodate the majority of Huntingdonshire's future housing development along with significant development opportunities in Huntingdon, St Ives, Ramsey, Brampton and Godmanchester.

Paragraph 5.39 is amended and elaborated to emphasise the concentration of employment in the Market Towns and to recognise the importance of market attractiveness in promoting delivery

Paragraph 5.40 is clarified in order to set out more clearly how key service centres will contribute to accommodating further growth whilst maintaining their character.

Elements of paragraphs 5.35 and 5.44 are incorporated in order to set out clearly the Council's preference for previously developed land. However, the need to make use of sustainable Greenfield options where necessary in order to accommodate the required growth is also identified. Further clarification on the Council's priority of previously development land was raised by respondents to Preferred Options consultation. Similarly, the Council has clarified its Strategy for the re-use of military sites in response to issues raised from consultation.

Elements of paragraph 5.41 have been incorporated to emphasise the importance of green space separation between settlements in the north and Peterborough.

A specific emphasis has been placed on the importance of Huntingdonshire's historic environment in response to issues raised through consultation as has the need to protect and enhance the District's greenspace, with specific areas of strategic greenspace enhancement identified, thereby incorporating paragraph 5.42.

The impacts and opportunities arising from the A14 improvements have been emphasised, as has the need to improve public transport. This incorporates elements of paragraph 5.43.

## Tests of Soundness

**.19** The main concern when considering the Vision in relation to the Tests of Soundness was test (v) for having regard to the Community Strategy. The Community Strategy and the Draft Sustainable Community Strategy (SCS) seek to address the particular issues and challenges that Huntingdonshire faces. The Vision has been modified through the plan process to reflect better the characteristics, issues and challenges faced by the District over the plan period. Additionally there has been extensive collaboration in preparation of the Local Development Framework and the draft SCS so far, which will continue. The Vision is therefore considered to pass test (v) and is considered to be sound.

**.20** Go-East considered that the Preferred Option Spatial Vision was not spatially specific and failed to adequately explain where growth will be accommodated. They were not clear how the Spatial Principles fit within the rest of the Core Strategy structure. It was recommended that the Council incorporate elements of the Spatial Principles into the Spatial Vision in order to address some of the issues raised in their representation and those not relevant deleted to avoid unnecessary duplication..

## Approach Taken

**.21** The approach taken is detailed in Volume 1 on page **X**.

# The Spatial Vision

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## The Spatial Objectives

**Table 3 Key Sources for the Objectives**

National	PPS1: Delivering Sustainable Development, PPS7: Sustainable Development in Rural Areas
Regional	East of England Plan policy SS1 Sustainable Construction in Cambridgeshire - a good practice guide (Cambridge Horizons and Cambridgeshire County Council 2006)
Local	Sustainable Communities Strategy

## Core Strategy Issues and Options

### Issues and Options identified for Consultation

Issue 2: To define a series of objectives for the Core Strategy to provide a focus for what it aspires to achieve.

Option 2: To minimise the impact on climate change by:

- enabling required development to be accommodated in locations which limit the need to travel whilst catering for local needs
- promoting developments that conserve natural resources and minimise greenhouse gas emissions

Option 3: To increase housing opportunities for people by:

- ensuring that the quantity and types of dwellings built meet the requirements of local people
- ensuring that an appropriate proportion of new housing is affordable to those in need
- enabling the specialist housing needs of particular groups to be met in appropriate locations

Option 4: To realise the economic potential of Huntingdonshire and its residents by:

- facilitating business development in sectors that have potential to meet local employment needs and limit out-commuting
- enabling business development in rural areas, in locations and on a scale which helps to provide local jobs, limits commuting and avoids adverse environmental impacts
- strengthening the vitality and viability of Huntingdonshire's town centres as places for shopping and leisure

Option 5: To improve the quality of life for local people by:

- providing a framework for securing adequate land and infrastructure to support business and community needs
- increasing opportunities for pursuing a healthy lifestyle by maintaining and enhancing recreation opportunities and encouraging walking, cycling and horse riding

Option 6: To improve and conserve Huntingdonshire's environment by:

- enhancing the distinctive identities of our villages and market towns

- enhancing our characteristic landscapes, habitats and species
- promoting areas of strategic greenspace enhancement

Question 3: Do you agree with the suggested objectives?

Question 4: Are there any additional objectives we should include?

## Reasonable Alternatives

.22 There is an infinite number of objectives that could be proposed for the Core Strategy. However, once it is adopted, the Core Strategy and the Regional Spatial Strategy will form the development plan for the District. Therefore, it is logical that the objectives of the Core Strategy form a local interpretation of the Regional Spatial Strategy's objectives.

## Summary of Initial Sustainability Appraisal on Issues and Options

.23 The Initial Sustainability Appraisal of the Issues and Options paper did not include the objectives but this was undertaken for the Initial Sustainability Appraisal for the Towards a Spatial Strategy and the draft Final Sustainability Appraisal.

## Consultation Responses to Issues and Options

.24 A significant number of respondents expressed concern that it was not sufficiently clear whether the alternative objectives were to be considered as a whole and could only be chosen as a complete group or not at all, or whether they could be selected individually.

## Further Options Consultation

### Towards a Spatial Strategy

Objectives put forward were:

- To maintain, enhance and conserve Huntingdonshire's characteristic landscapes, habitats and species
- To conserve and enhance the special character and separate identities of Huntingdonshire's villages and market towns
- To ensure that design of new development integrates effectively with its setting and promotes local distinctiveness
- To promote developments that conserve natural resources, minimise greenhouse gas emissions and help to reduce waste
- To secure developments which are accessible to all potential users, and which minimise risks to health as a result of crime (or fear of crime), flooding or pollution and climate change
- To enable required growth to be accommodated in locations which limit the need to travel, while also catering for local needs
- To ensure that the types of dwellings built are suited to the requirements of the local population, and that an appropriate proportion of units is 'affordable' to those in need
- To enable specialist housing needs of particular groups to be met in appropriate locations
- To facilitate business development in sectors that have potential to meet local employment needs and limit out commuting

# The Spatial Vision

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## Summary of Initial Sustainability Appraisal for Towards a Spatial Strategy

.25 The Initial Sustainability Appraisal compared the Sustainability Appraisal objectives against the draft plan objectives. There were a number of relationships that were identified as being uncertain - these related primarily to minimising water, reducing waste generation and energy consumption and objectives concerning residential and employment development. This was because although waste, water use and energy use will inevitably be increased by development, there are a number of mitigation measures that can be implemented to help address this issue. Nevertheless, overall the objectives were either appraised to have no relationship or a potentially positive relationship.

## Key Stakeholders' Responses

.26 All but 2 respondents broadly supported the objectives put forward. Limited concerns were expressed regarding the need for more emphasis on infrastructure and provision of affordable and elderly persons housing. The ability to achieve the objectives in the face of major growth requirements was also questioned.

### Assessment of Responses and Alternative Approaches

.27 The Objectives have been expanded to better address business development, services and facilities in villages and the vitality and viability of town centres. Also added are objectives covering healthy lifestyles and recreation and infrastructure for business and community needs.

.28 The objectives have been re-ordered to better reflect the priorities of the Spatial Strategy.

## Core Strategy Preferred Options

### Objectives put Forward for Participation on Preferred Options

1. To enable required growth to be accommodated in locations which limit the need to travel, while catering for local needs
2. To ensure that the types of dwellings built are suited to the requirements of the local population, and that an appropriate proportion is 'affordable' to those in need
3. To enable specialist housing needs of particular groups to be met in appropriate locations
4. To facilitate business development in sectors that have potential to meet local employment needs and limit out commuting
5. To strengthen the vitality and viability of Huntingdonshire's town centres as places for shopping and leisure
6. To enable business development in rural areas, in locations and on a scale which helps to provide local jobs, limits commuting and avoids adverse environmental impacts
7. To maintain and enhance the availability of key services and facilities including communications services
8. To maintain, enhance and conserve Huntingdonshire's characteristic landscapes, habitats and species
9. To identify opportunities to increase and enhance major strategic greenspace
10. To conserve and enhance the special character and separate identities of Huntingdonshire's villages and market towns
11. To ensure that design of new development integrates effectively with its setting and promotes local distinctiveness
12. To promote developments that conserve natural resources, minimise greenhouse gas emissions and help to reduce waste

13. To secure developments which are accessible to all potential users, and which minimise risks to health as a result of crime (or fear of crime), flooding or pollution and climate change
14. To increase opportunities for pursuing a healthy lifestyle, by maintaining and enhancing recreation opportunities and encouraging walking and cycling
15. To provide a framework for securing adequate land and infrastructure to support business and community needs

## Reasonable Alternatives

.29 Consultation on the Preferred Options identified useful additions which could be included in the objectives to strengthen them. Additional objectives could have been included in order to respond to the issues raised.

## Summary of Draft Final Sustainability Appraisal

.30 The Sustainability Appraisal Objectives were tested against the Core Strategy objectives in a compatibility matrix. It was found that the objectives on the whole have a positive relationship or no identified links. However, a number of uncertain relationships were identified although these were largely unavoidable and result from development, for example, minimising water, reducing waste and energy consumption.

## Consultation Responses

.31 Responses to the objectives were evenly split with around 50% supporting and 50% objecting. Those objectives that were cited by respondents as being good were objectives 7, 8, 9, 12, and 14. Objectives which were cited for objection included 1, 2, 3, 6, 13 and 15. In most cases respondents offered alternative ways of phrasing the objectives to make them more appropriate. However, it was suggested that more emphasis needs to be put on the historic environment, that better use of information relating to health should underpin the objectives and Core Strategy as a whole, and that an objective on climate change should be included.

## Assessment of Responses and Alternatives

As objectives form the basis of the monitoring framework it is important that they are specific, measurable, appropriate, reasonable and can be measured in a specific timeframe (SMART). Additional objectives reflecting some of the issues raised through consultation such as climate change would be beneficial. It is more appropriate to edit some of the existing objectives to respond to other concerns. It is also important that the objectives be closely reflected in the monitoring indicators. Due to difficulty in gathering data for some indicators, as identified in the Annual Monitoring Report and the Sustainability Appraisal Scoping Report, the Council is somewhat limited in the objectives which can be included and adequately monitored.

## Changes Made

Further clarification as to the purpose of the objectives and their relationship to the spatial vision has been included. This was an issue raised through the consultation process.

# The Spatial Vision

Huntingdonshire District Council | Core Strategy - Submission Version - Volume Two

A number of objectives have been strengthened by including additional wording and references to issues raised through the consultation process. Specific regard has been had to the historic environment, climate change, sustainable travel and tourism for this reason. Two additional objectives have been incorporated to address climate change and the priority to be given to redevelopment of brownfield land. The objectives that have been strengthened are 1,2, 5, 6, 8, 11 and 15.

## Tests of Soundness

- .32 There are no particular concerns with compliance with the Tests of Soundness.
- .33 Go-East did not comment on the objectives.

## Approach taken

- .34 The approach taken is set out in Volume 1 on page x.

# The Cornerstone of Sustainable Development

Huntingdonshire District Council | Core Strategy - Submission Version - Volume Two

## The Cornerstone of Sustainable Development

**Table 4 Key Sources for Sustainable Development**

National	PPS1: Delivering Sustainable Development PPS1 Supplement: Planning and Climate Change PPS7: Sustainable Development in Rural Areas Securing the Future - Delivering UK Government Sustainable Development Strategy (HM Government) 2005
Regional	East of England Plan Sustainable Construction in Cambridgeshire - a good practice guide (Cambridge Horizons and Cambridgeshire County Council 2006), A Sustainable Development Framework for the East of England (Sustainable Development Round Table for the East of England 2001), Sustainable Communities in the East of England (ODPM, 2003) Towards Sustainable Construction - A Strategy for the East of England (EP, CE, GOEast, PECT, 2003)
Local	Huntingdonshire Community Strategy (2004) Sustainable Community Strategy for Huntingdonshire (2008)

### Core Strategy Issues and Options

#### Issues and Options identified for Consultation

Issue 3: The requirement to promote sustainable development to ensure that the needs of our residential, business and interest communities are met whilst not compromising the ability of future generations to meet their own needs.

Option 7: Policies will indicate that all development proposals should contribute to the pursuit of sustainable development.

Criteria could be set out to assess how a development proposal will achieve this. These could reflect social, economic and environmental issues including how the proposal would contribute to minimising the impact on climate change.

An assessment could be required to accompany any proposal for major development to demonstrate how these have been met.

Question 5: What criteria do you consider most important in assessing how a development proposal will contribute to sustainable development?

Question 6: Should those promoting a major development be required to complete an assessment to show how they have addressed these criteria?

# The Cornerstone of Sustainable Development

Huntingdonshire District Council | Core Strategy - Submission Version - Volume Two

## Reasonable Alternatives

.1 None. The promotion of sustainable development is required by national and strategic guidance, and criteria are necessary to indicate how this objective will be interpreted.

## Summary of Initial Sustainability Appraisal on Issues and Options

.2 The appraisal process identified the option as being sustainable. It did suggest that the policy would need to be carefully worded in order to address all aspects of sustainable development.

## Consultation Responses to Issues and Options

.3 Many respondents thought this was important and supported the principles identified. Some respondents considered the assessment proposed as part of this approach to be unnecessary and would be likely to duplicate information required through other established requirements.

### Assessment of Responses and Alternative Approaches

.4 Care has been taken to ensure that the criteria in the Preferred Approach represent a balance between the three areas of economic, social and environmental sustainability.

.5 Care has also been taken to try to ensure that the criteria are straightforward and do not encroach significantly into aspects of development that are assessed or appraised by other established requirements.

## Core Strategy Preferred Options

### Policy Wording put Forward for Participation on Preferred Options

All plans, policies and programmes of the Council and its partners, with a spatial element, along with all development proposals in Huntingdonshire will contribute to the pursuit of sustainable development.

Reflecting environmental social and economic issues the following criteria will be used to assess how a development proposal will be expected to achieve the pursuit of sustainable development including how the proposal would contribute to minimising the impact on and of climate change. All aspects of proposals will be considered including the design, implementation and function of development. The criteria are:

making best use of land and existing infrastructure;

minimising the use of non-renewable energy sources and construction materials and maximising opportunities for renewable energy;

minimising water consumption, and the impact on water resources and flood risk;

curtailing greenhouse gas emissions and other forms of pollution;

encouraging waste reduction and recycling;

preserving the diversity and distinctiveness of Huntingdonshire's towns, villages and landscapes including the conservation of buildings, sites and areas of architectural or historic importance;



# The Cornerstone of Sustainable Development

Huntingdonshire District Council | Core Strategy - Submission Version - Volume Two

maintaining and enhancing the range and vitality of characteristic habitats and species;

creating places that are attractive, respond well to their surroundings, adaptable, and which are accessible and safe to use for all sections of the community and encouraging regeneration;

contributing to social cohesion;

supporting the local economy and businesses; and

limiting the need to travel, and increase opportunities to make necessary journeys by foot, cycle or public transport.

An assessment will be required to accompany any proposal for major development to demonstrate how the criteria have been met.

## Reasonable Alternatives

.6 As a result of Preferred Options consultation a number of suggestions were made as to how this policy could be strengthened. Some respondents also indicated that this policy is not necessary as it simply repeats requirements to contribute to sustainable development already within the planning process. The reasonable alternatives assessed below are:

- Strengthen existing policy
- Remove the policy

## Summary of Draft Final Sustainability Appraisal

.7 The policy is strongly sustainable in areas of protection of the natural and built environment and these will contribute to other objectives of creating more sustainable communities. However, social cohesion is mentioned only in brief without any support statement as to how this should be achieved and no mention is given to promoting economic growth. The difference in assessment relates to the extent the policy directly quotes or is linked to the objective. The policy is therefore explicitly sustainable in the majority of areas – specifically those relating to environmental objectives however, is less so in terms of social or economic objectives, some of which are not explicitly referenced.

.8 It was recommended that consideration be given to ensuring criteria relating to social and economic objectives are more explicit, reflecting the wording of the SA objectives to ensure that there is more consistency which better reflect the three areas of sustainable development.

## Summary of Appropriate Assessment

.9 The Appropriate Assessment states that additional housing delivered through the Core Strategy will lead to additional water abstraction from the Ouse Washes which could cause damage to the sensitive features of the site by either reducing the incidence of flooding or causing actual drought. Potential significant effects on water resources arising from development have also been identified for Portholme, Rutland Water and the Nene Washes

.10 Although the need for sufficient water supply is addressed by the Environment Agency, local authorities have a role to play and policy 1 (sustainable development) clearly identifies the need to minimise water consumption, although no measures are provided against which this can be monitored.

# The Cornerstone of Sustainable Development

Huntingdonshire District Council | Core Strategy - Submission Version - Volume Two

## Consultation Responses

.11 Responses to the preferred policy were fairly evenly split with 15 out of 32 respondents clearly stating that they support the policy and 17 opposing it. A clear objection that was apparent related to the concern that the policy replicated other requirements when submitting planning applications and that sustainable development should be incorporated into the emerging Development Control Policies DPD as it is a specific, not strategic issue. Other respondents suggested that the policy did not have proper regard to the requirements of PPS25 and PPS1 Climate Change and that these pieces of national policy need to be explicitly referenced. Furthermore, it was suggested that the policy failed to consider adequately the issues of health, community cohesion, biodiversity and provision of sports and recreation facilities and that these should each form a separate criteria. A number of respondents recommended policy wording changes such as the need to strengthen the criteria for the historic built environment.

### Assessment of Responses and Alternatives

A number of responses did indicate that this policy was not needed as the requirement to achieve sustainable development is covered elsewhere in the planning process, for example, when submitting a planning application it is a requirement to cover all information listed within the new 1 App system, which includes a sustainability assessment; sustainability issues are also covered within Design and Access Statements. The forthcoming requirements of the Code for Sustainable Homes were also mentioned in a number of responses as further evidence of how proposals are currently required to contribute to sustainable development. The policy is intended to add to these requirements by including specific criteria that will need to be met by proposals. Furthermore, it provides guidance to cover the interim period until the Code for Sustainable Homes is mandatory for all new homes.

The supplement to PPS1 on climate change had not been published when the preferred approach was prepared so its implications needed to be taken into account for the submission version. A number of respondents made helpful suggestions as to how the policy could be improved by including more information on, for example, health and community cohesion.

### Changes Made

In response to issues raised through Preferred Options consultation criteria covering the following have been included:

- health, active lifestyles and sport and recreational facilities;
- community cohesion, empowerment and involvement in the design, planning and management of proposals.

In addition, a number of criteria have been strengthened and include reference to issues raised through the consultation process. This relates specifically to making the best use of land, renewable energy, reducing water consumption and minimising flood risk and minimising waste. Furthermore, the importance of the historic and archaeological environments has been emphasised as has the need to create sustainable and well designed places which respond to the surrounding context.

The reasoned justification has been significantly expanded in order to explain how proposals will be expected to comply with the criteria. It also responds to other issues raised such as the need for the policy to consider adaptation to climate change.

## Tests of Soundness

.12 There are no particular concerns with compliance with the Tests of Soundness.

.13 Go East did not comment on policy wording 1.

## Approach Taken

.14 The approach taken is detailed in Volume 1 on page 15.

# The Spatial Strategy

Huntingdonshire District Council | Core Strategy - Submission Version - Volume Two

## The Spatial Strategy

### Strategic Housing Growth

**Table 1 Key Sources for Strategic Housing Growth**

National	PPS1: Delivering Sustainable Development PPS1 Supplement: Planning and Climate Change PPS3: Housing PPS7: Sustainable Development in Rural Areas PPS25: Development and Flood Risk Development and Flood Risk: A Practice Guide Companion to PPS25 A 'Living Draft' consultation paper
Regional	East of England Plan Cambridge Sub Region Strategic Housing Market Assessment (2008) Saved policy P9/4 Cambridgeshire and Peterborough Structure Plan 2003
Local	Housing Land Availability Study (HLAS) (2007) updated and adapted to form the Strategic Housing Land Availability Assessment (SHLAA) (2008) Settlement Hierarchy Background Paper Update (2007) Huntingdonshire Housing Needs Survey (2002) and Update (2006) Huntingdonshire Housing Strategy 2006-11 (2006) Huntingdonshire Strategic Flood Risk Assessment (2004)

### Core Strategy Issues and Options

#### Issues and Options identified for Consultation

Issue 4: Identification of areas where development could be focused to promote sustainable opportunities for access to jobs, services and facilities.

Huntingdon area: this includes Huntingdon, Brampton and Godmanchester and had 31,000 residents in 2005. The area is a key driver of the local economy. The Housing Land Availability Study (HLAS) (2007) identified that this area offers significant opportunities for development. The realignment of the A14 could have implications for development opportunities, particularly post 2015.

St Neots area: this includes St Neots and Little Paxton and had a population of 31,200 in 2005. Coupled with land in Bedfordshire around Wyboston, the area is also a key driver of the local economy. The HLAA identified that this area offers significant opportunities for development.

St Ives: is smaller in scale than Huntingdon and St Neots with a population of just under 16,000 in 2005. It offers fewer opportunities for sustainable development options. The HLAA identified a limited number of suitable sites with flooding being a major constraint. However, St Ives is within the prosperous Cambridge sub-region and will see significant changes in accessibility with the completion of the guided bus route.

Ramsey area: this includes Ramsey and Bury, but excludes Ramsey Forty Foot, Ramsey Heights, Ramsey Mereside and Ramsey St Marys, and had a population of around 8,000 in 2005. Major housing growth was discounted by the Inspector during the 2002 Local Plan alteration due to Ramsey's poor sustainability. It has relatively poor transport infrastructure and, despite previous allocations, has limited employment opportunities.

Option 8: To use the spatial planning areas described above when identifying strategic directions of growth. These would be used for assessing potential development sites for allocation within the Planning Proposals DPD or the Huntingdon West AAP.

Question 7: Do you agree with the approach of considering potential Market Towns in conjunction with the adjoining settlements identified above solely for the purposes of assessing strategic development allocations?

## Reasonable Alternatives

.1 Strategic growth allocations could be focused only within the four largest towns in the District with no recognition of the role or potential land availability in Key Service Centres.

### Issues and Options identified for Consultation

We need to make fundamental choices on whether the District should pursue a very intense urban focus for new growth or a more dispersed approach; whether priority should always be given to re-use of brownfield land or whether in some circumstances developing greenfield land with very good access to services and facilities is preferable. Rather than put forward a particular choice the options are deliberately left wide open to incorporate a number of possible alternatives.

Issue 6: The need to identify strategic directions of growth to guide where sites will be allocated for development.

A series of maps follows in this section which indicate possible directions of growth from each of the larger settlements in the District. These are coded alphabetically and provide an indication of the possible scale of development that could be accommodated. The maps indicate a wide range of alternatives not all of which will be needed to achieve the scale of growth required in the Regional Spatial Strategy. They show possible directions for housing, employment and mixed use development.

It is likely that many growth areas will accommodate a mixture of housing and employment uses to help develop balanced, sustainable communities and provide viable transport choices. However, to best ascertain people's preferences housing, employment and retail are discussed separately below.

### Huntingdon and St Neots Areas

Option 10: Policies could propose that the Huntingdon area should get most of the growth.

Option 11: Policies could propose that the St Neots area should get most of the growth.

Option 12: Policies could propose both areas to grow at a similar rate.

Question 11: What proportion of growth should be focused in the two main urban areas?

# The Spatial Strategy

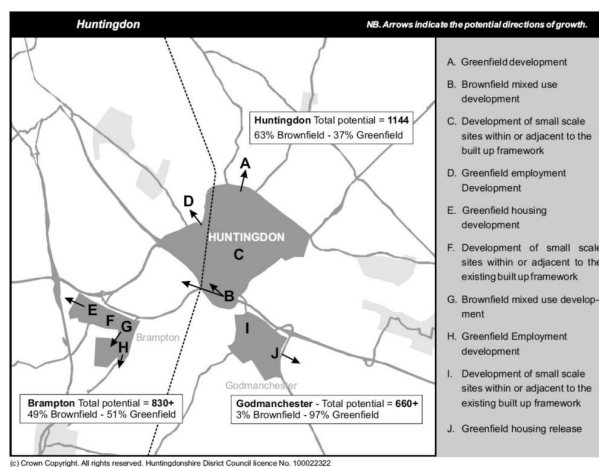
## Huntingdonshire District Council | Core Strategy - Submission Version - Volume Two

Question 12: Which of these options would you prefer and why?

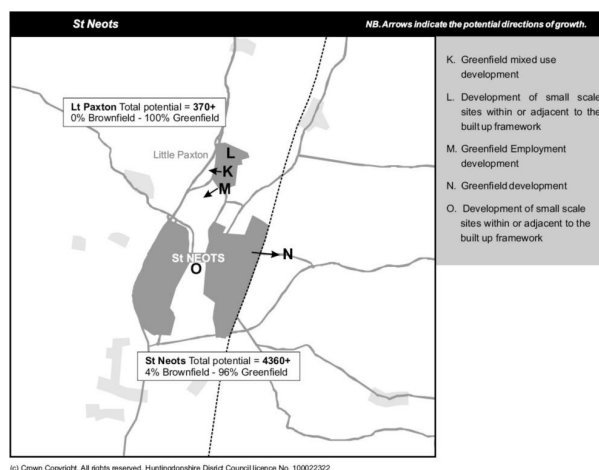
Question 13: Are there any other options which should be considered?

Question 14: To achieve your chosen option which of the directions of growth shown on the maps would you rather see developed?

**Figure .1 Huntingdon Area**



**Figure .2 St Neots Area**



### St Ives and Ramsey

Strategic guidance indicates that St Ives and Ramsey should receive a smaller level of growth. When considering development in these two locations the following options have been identified.

Option 13: Strategic directions of growth could allow growth only within the existing built framework in Ramsey and/ or St Ives.

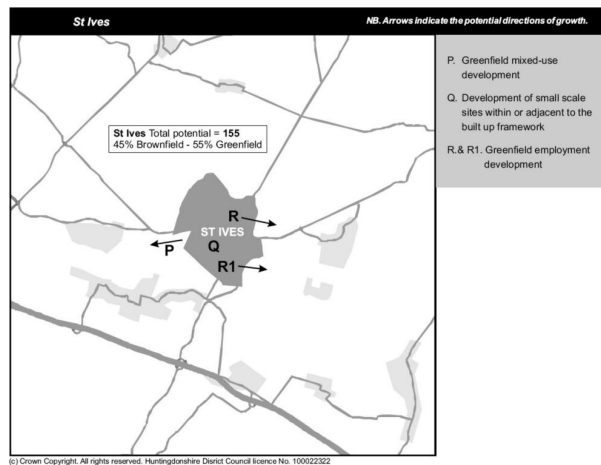
Option 14: Strategic directions of growth could allow growth within small-scale extensions to Ramsey and/ or St Ives.

Question 15: Which of these options would you prefer and why?

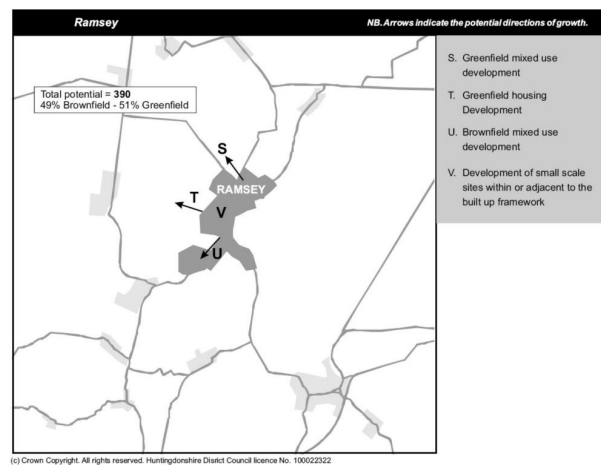
Question 16: Are there any other options which should be considered?

Question 17: Which of the directions of growth shown on the maps would you rather see developed?

**Figure .3 St Ives Area**



**Figure .4 Ramsey and Bury Area**



## Key Service Centres

When considering development in possible Key Service Centres that are not closely linked with a Market Town the following options have been identified.

# The Spatial Strategy

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Option 15: Development could be distributed across all Key Service Centres broadly in proportion to their existing size and level of facilities.

Option 16: Development could be more limited in those settlements which have recently received high levels of growth.

Question 18: Which of these options would you prefer and why?

Question 19: Are there any other options which should be considered?

Question 20: Which of the directions of growth shown on the maps would you rather see developed?

Figure .5 Fenstanton

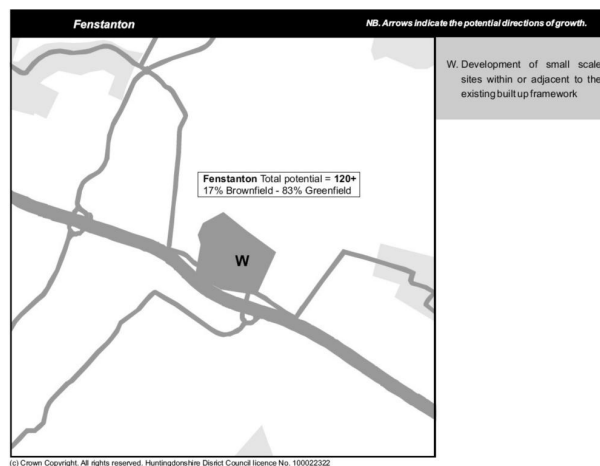
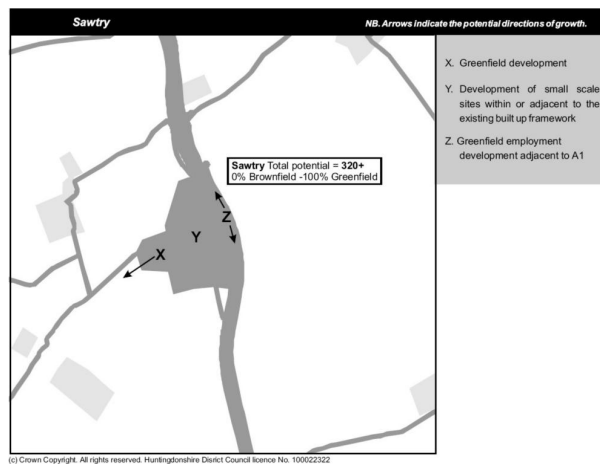
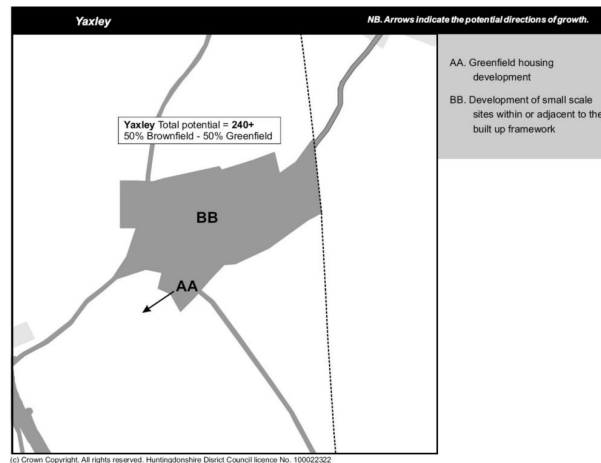


Figure .6 Sawtry





**Figure .7 Yaxley**



## Reasonable Alternatives

.2 The maps presented above included a wide range of options which could be amalgamated in very many ways to produce alternative packages of growth options.

## Summary of Initial Sustainability Appraisal of Issues and Options

.3 The identification of spatial planning areas for strategic growth was considered sustainable in terms of focusing growth in areas that reduce the need to travel and maximise brownfield opportunities. The reasonable alternative, which proposed that growth would be limited to the four market towns, was considered to be less sustainable as it may limit the opportunity to use brownfield land outside of the market towns.

.4 Huntingdon and St Neots areas: all three options were identified as being sustainable. However, Option 11 was considered to be less sustainable than Option 10 as it would result in increased greenfield development which is contrary to Government guidance. Concern was also noted for the impact of development on one settlement. Option 12 was identified as being a good way to distribute growth across the two settlements, although the use of greenfield land was recognised.

.5 St Ives and Ramsey: both options were identified as being sustainable as they direct growth towards market towns. However, it was suggested that option 14 may reduce the need to direct further growth to less accessible settlements and improve accessibility to services and facilities.

.6 Key service centres: Option 15 was identified as being the most sustainable as it helps ensure development is located in areas where services and facilities are available and reduces the need to travel. It also maximises the use of brownfield land compared to option 16.

## Consultation Responses to Issues and Options

.7 There was some opposition to the concept of spatial planning areas with some people thinking that the towns would subsume nearby settlements resulting in their loss of identity. Others, however, supported the concept as a pragmatic way of achieving sustainable development. In particular, a number of respondents considered that greater emphasis should be given to growth around Huntingdon and St Neots. Concern was expressed over the relationship between the spatial planning areas and the settlement hierarchy.

# The Spatial Strategy

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.8 It was suggested that Buckden should be considered as part of either the Huntingdon Area or the St Neots Area and that Needingworth, Hemingford Grey and Houghton should be part of a St Ives strategic planning area. There was also the suggestion that another spatial planning area should be designated to the north of the District close to Peterborough which would include Yaxley, Stilton and Farcet on the basis that development close to Peterborough would be more sustainable than more remote locations.

.9 There was strong support for clear indication of the preferred directions of growth although obviously many differing opinions on where growth should be focused with many representations promoting specific sites for development. A number of representations stressed the general principle of making best use of previously developed land irrespective of its location.

.10 There was an equal balance between support for concentrating growth in Huntingdon or St Neots with most respondents favouring a reasonably equal distribution. Of greater concern to many respondents was the capacity of the infrastructure to absorb significant growth, particularly with regard to the transport impacts.

.11 A number of respondents sought a higher level of growth in St Ives citing its greater sustainability than Ramsey. Others, however, were concerned over flooding and environmental capacity issues in St Ives.

.12 There was general support for provision of some development in all Key Service Centres to help reinforce their role as focal points for surrounding villages.

## Further Options Consultation

### Towards a Spatial Strategy

Four options considered for overall distribution of growth including housing.

#### *Cambridge Sub-region Focused Growth*

This option sought to concentrate growth in the towns and key service centre villages of the Cambridge Sub-region. The housing growth was to be distributed roughly equally between the Huntingdon and St Neots Areas with a significant amount in St Ives. This is illustrated in figure 1 and in table 1.

#### *Huntingdon Area Focused Growth*

This option sought to concentrate growth mainly in the Huntingdon Area. There was to be most of the housing growth in the Huntingdon Area of Brampton, Godmanchester and Huntingdon, with St Neots a lesser, although still significant amount. St Ives would see less housing while other settlements would have some growth. This is illustrated in figure 2 and in table 2.

#### *St Neots Area Focused Growth*

This option sought to concentrate growth mainly in the St Neots Area. There was to be most of the housing growth in the St Neots Area of Little Paxton and St Neots, with the Huntingdon Area having a lesser, although still significant amount. St Ives would see less housing while other settlements would have some growth. This is illustrated in figure 3 and in table 3. This option was considered to have significant merits not least of all for the potential to master plan a significant extension to the town and the opportunities to ensure comprehensive service provision. However following detailed consideration

#### *Dispersed Growth*

This option sought to distribute growth throughout the District. The housing growth was to be distributed roughly equally between the Huntingdon and St Neots Areas with a significant amount in St Ives but a significant amount was to be distributed to Ramsey and Bury and key service centre villages. This is illustrated in figure 3 and in table 3.

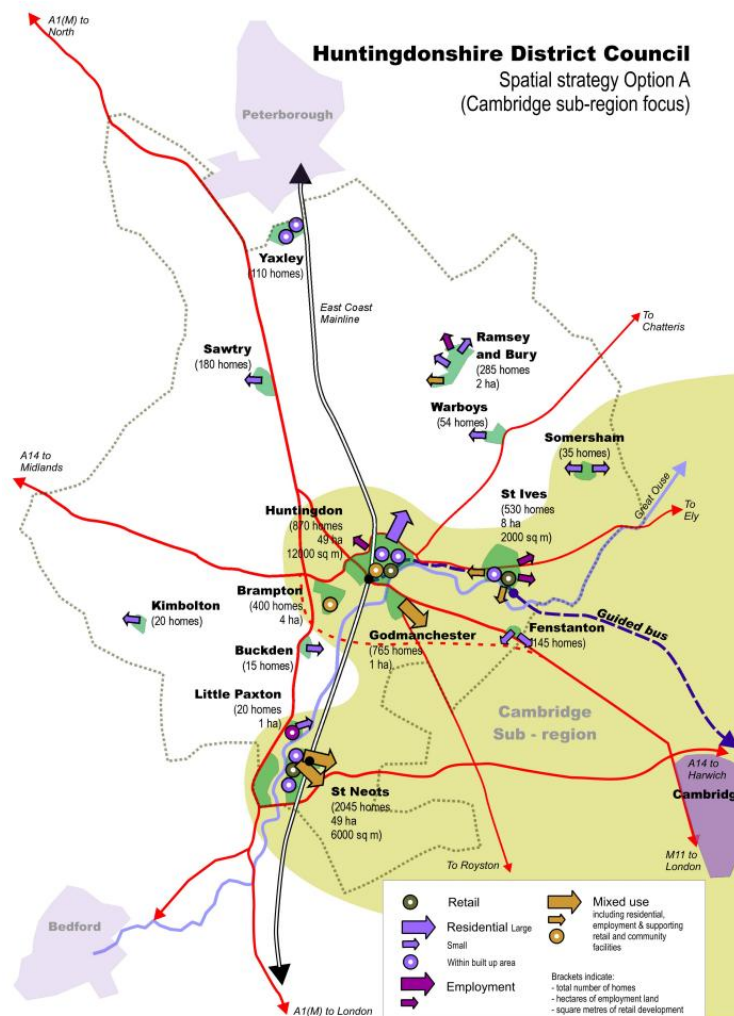
.13

**Table 2 Distribution of Development for the Cambridge Sub-region Focus Option**

Settlement	Housing Provision (Dwellings)	Employment Provision (ha)	Retail Comparison Floorspace Provision (sqm)
<b>Huntingdon Area</b>	2060	50	12,000
Huntingdon	970	41	12,000
Godmanchester	690	5	
Brampton	400	4	
<b>St Neots Area</b>	2100	50	6,000
St Neots	2080	49	6,000
Lt Paxton	20	1	
St Ives	525	8	2,000
Ramsey and Bury	240	2	-
Buckden	15	-	-
Fenstanton	135	-	-
Kimbolton	25	-	-
Sawtry	150	-	-
Somersham	35	-	-
Warboys	55	-	-
Yaxley	110	-	-
<b>Total</b>	5450	110	20,000

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**Table 3 Distribution of Development for the Huntingdon Area Focus Option**

Settlement	Housing Provision (Dwellings)	Employment Provision (ha)	Retail Comparison Floorspace Provision (sqm)
<b>Huntingdon Area</b>	<b>2655</b>	<b>65</b>	<b>12,000</b>
Huntingdon	1140	56	12,000
Godmanchester	690	5	-
Brampton	825	4	-
<b>St Neots Area</b>	<b>1765</b>	<b>40</b>	<b>6,000</b>
St Neots	1745	39	6,000
Little Paxton	20	1	-
St Ives	345	3	2,000
Ramsey and Bury	240	2	-
Buckden	15	-	-

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Fenstanton	55	-	-
Kimbolton	25	-	-
Sawtry	150	-	-
Somersham	35	-	-
Warboys	55	-	-
Yaxley	110	-	-
<b>Total</b>	<b>5450</b>	<b>110</b>	<b>20,000</b>

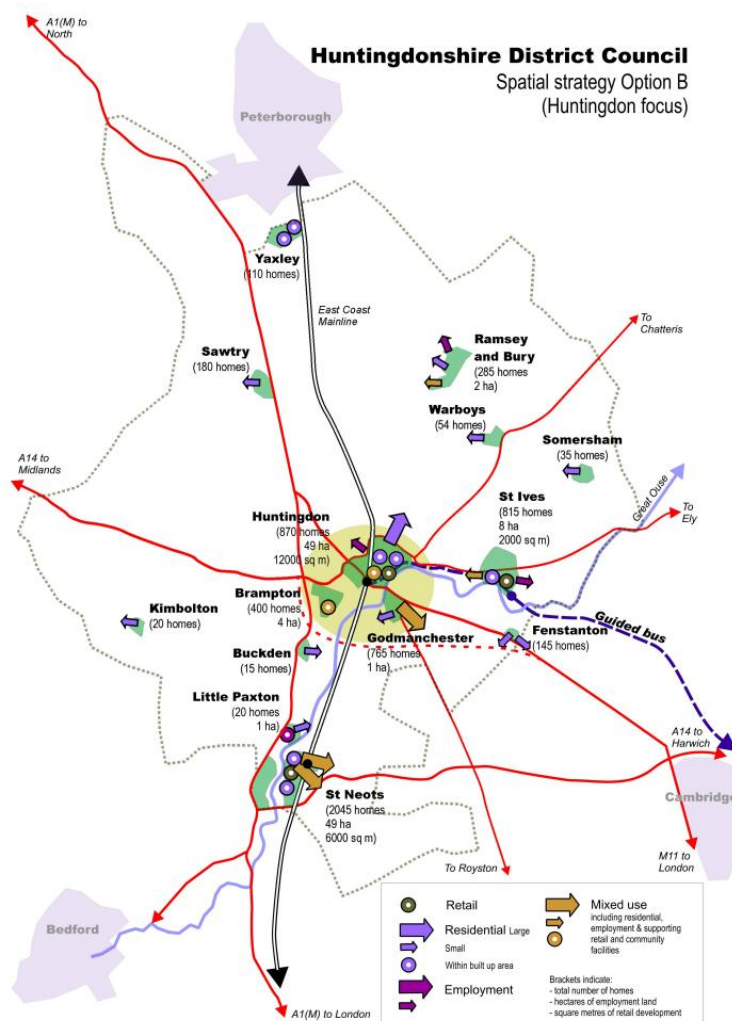


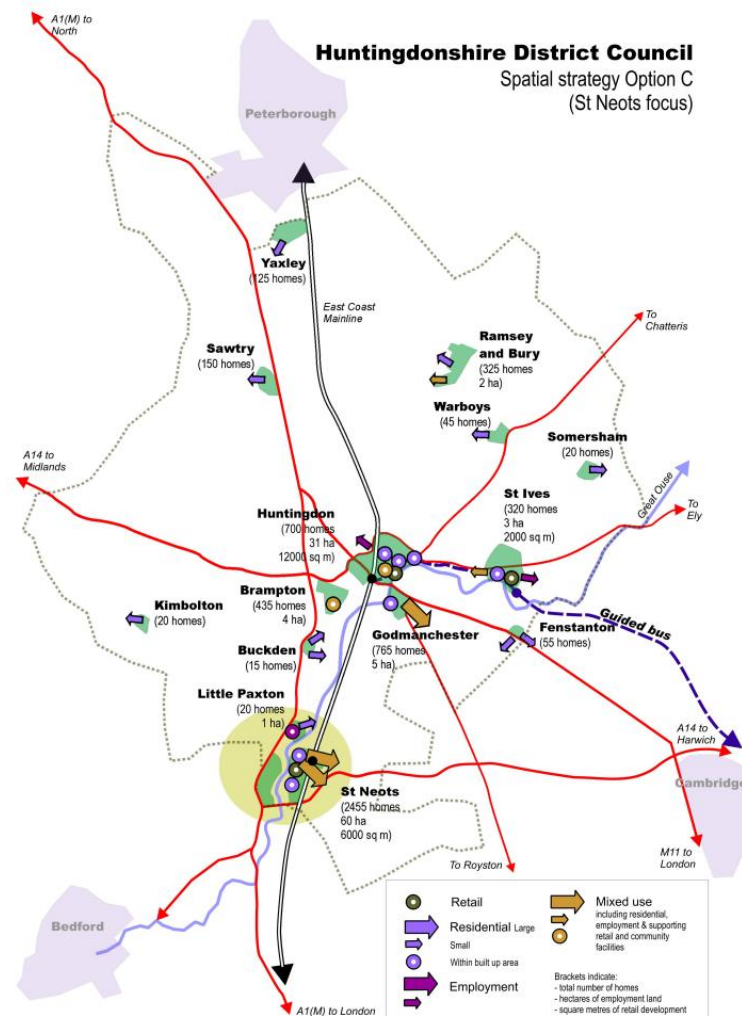
Table 4 Distribution of Development for the St Neots Area Focus Option

Settlement	Housing Provision (Dwellings)	Employment Provision (ha)	Retail Comparison Floorspace Provision (sqm)
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<b>Huntingdon Area</b>	<b>1220</b>	<b>40</b>	<b>9,000</b>
Huntingdon	680	36	9,000
Godmanchester	140	-	-
Brampton	400	4	-
<b>St Neots Area</b>	<b>3220</b>	<b>65</b>	<b>9,000</b>
St Neots	3210	64	9,000
Little Paxton	20	1	-
St Ives	315	3	2,000
Ramsey and Bury	240	2	-
Buckden	15	-	-
Fenstanton	55	-	-
Kimbolton	25	-	-
Sawtry	150	-	-
Somersham	35	-	-
Warboys	55	-	-
Yaxley	110	-	-
<b>Total</b>	<b>5450</b>	<b>110</b>	<b>20,000</b>



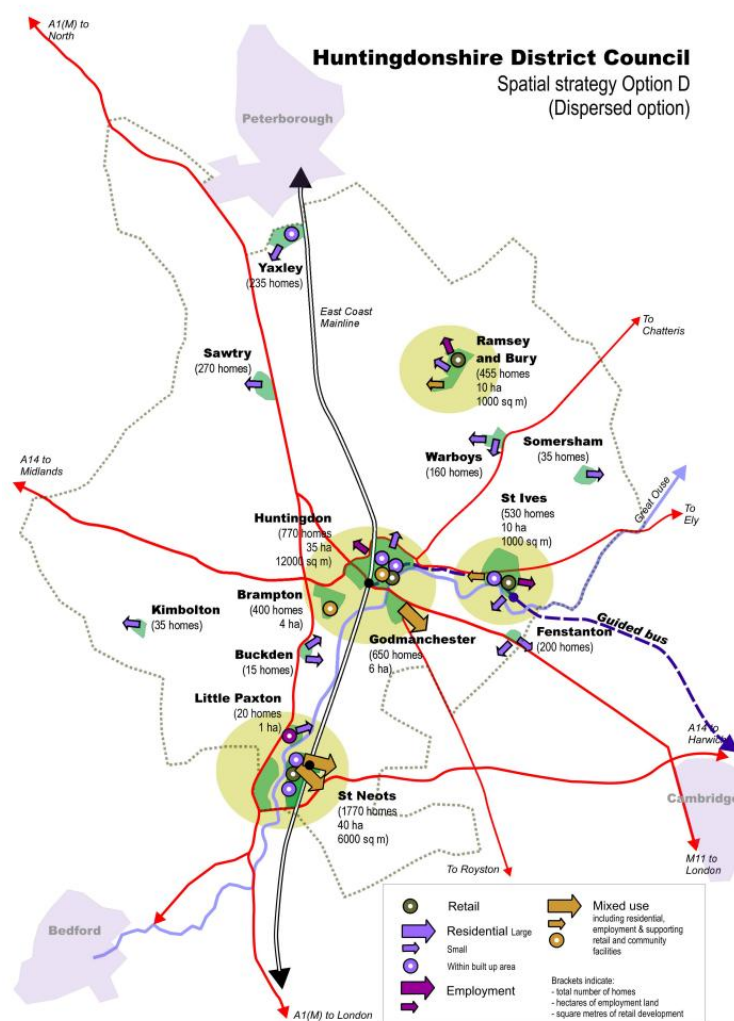
**Table 5 Distribution of Development for the Dispersed Option**

Settlement	Housing Provision (Dwellings)	Employment Provision (ha)	Retail Comparison Floorspace Provision (sqm)
<b>Huntingdon Area</b>	<b>1410</b>	<b>46</b>	<b>12,000</b>
Huntingdon	870	42	12,000
Godmanchester	140	-	-
Brampton	400	4	-
<b>St Neots Area</b>	<b>1745</b>	<b>46</b>	<b>6,000</b>
St Neots	1725	45	6,000
Little Paxton	20	1	-
St Ives	525	8	1,000

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Ramsey and Bury	510	10	1,000
Buckden	75	-	-
Fenstanton	135	-	-
Kimbolton	50	-	-
Sawtry	270	-	-
Somersham	35	-	-
Warboys	190	-	-
Yaxley	235	-	-
<b>Total</b>	<b>5450</b>	<b>110</b>	<b>20,000</b>





## **Towards a Spatial Strategy - Options for Additional Growth**

Recent government guidance has urged local planning authorities to consider going beyond the level of growth advocated in the emerging RSS where need and demand for housing are high. Towards a Spatial Strategy considered three options for additional growth. these focused on provision of extra housing assuming that commensurate growth in employment and retailing would follow.

### *Enhanced Growth in the St Neots Area*

This option supplemented the St Neots Area Focused Growth option with a further 1,000 homes to the east of the town.

### *Enhanced Growth in the Cambridge Sub-region*

This option supplemented the Cambridge Sub-region focused growth option with a further 1,800 homes in the Huntingdon and St Neots areas and in the Key Service Centres within the Cambridge sub-region.

### *A New Eco-town*

This option saw growth in any one of the spatial options considered coupled with a new eco-town at either Alconbury or Wyton airfields. Use of Wyton airfield could result in an increase from 5,450 new homes in the District to 12,000. Use of Alconbury could see an increase to 15,000 new homes. both choices would involve delivery of homes extending beyond the 2026 plan period.

## **Summary of Initial Sustainability Appraisal for Towards a Spatial Strategy**

**.14** Both the Huntingdon Area focused growth and St Neots Area focused growth scored consistently well in the appraisal process. Although the St Neots Area focused growth directs large scale growth towards greenfield land, this is in the most sustainable location and would facilitate the provision of social and physical infrastructure. These options were also less affected by flood risk than the other options. Both options direct employment and retail growth towards areas with strong market demand and in both options the status of Huntingdon, as the principal town, in the District can be enhanced and its competitiveness against the higher order centres of Cambridge, Peterborough and Bedford is improved.

**.15** The Cambridge-Sub Region focus is constrained by flood risk and the identification of some locations in St Ives were considered to pose an unacceptable flood risk. The Dispersed option is considered to be the least sustainable of all the options as growth would be directed towards settlements with a reduced range of services and transport infrastructure compared to market towns and would possibly increase car dependency.

**.16** The appraisal of the additional options for growth showed that the options for enhanced growth in the Cambridge-Sub Region and St Neots area scored consistently higher than the Eco Town option. However, key sustainability issues that were raised within the Cambridge Sub-Region and St Neots area options were the flood risk posed for the former option and the potential integration issues raised from major growth towards greenfield land in St Neots. It was considered that the Eco Town option, although providing significant opportunities for housing and employment provision, would require substantial new infrastructure provision. As there are other, potentially more sustainable locations outside the District that can accommodate large scale growth, it is considered that this option requires consideration at a wider forum.

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## Key Stakeholders' Responses

**.17** The Cambridge sub-region focused growth option gained qualified support from 5 out of 17 respondents who thought it offered the most balanced option and would maximise the use of existing infrastructure and services. The main concerns expressed over this option were flooding, especially in St Ives, and the spread of development resulting in contributions to infrastructure being diluted.

**.18** The Huntingdon area focused growth option received qualified support from 8 out of 21 respondents. They considered it to offer a central location in the District with good and improving communication links and to respond best to market preferences for employment and retail growth. The main concerns expressed were over the environmental capacity of the local area to absorb more growth and congestion implications.

**.19** The St Neots area focused growth option received qualified support from 7 out of 18 respondents who thought it was most likely to deliver a sustainable new neighbourhood with good local services, employment and infrastructure. The main concerns were the high reliance on use of greenfield land and the limited scope for additional development in St Neots town centre.

**.20** The Dispersed growth option received qualified support from 7 out of 19 respondents who generally believed it would reduce the impact of development on any one existing settlement. The main concerns expressed were that this option offered a more or less sustainable approach to development depending on the respondents viewpoint and that the shortage of rural employment opportunities would result in this option giving rise to greater dependency on car transport.

**.21** Regarding the options for additional growth that proposed enhanced growth in the St Neots area obtained qualified support from 7 out of 13 respondents. The option proposing enhanced growth in the Cambridge sub-region was only supported by 2 out of 11 respondents. 5 out of 12 respondents considered there to be some merit in exploring the option of a new eco-town either in addition to or instead of other options with Alconbury being favoured over Wyton. However, concerns were expressed about this being progressed outside the RSS process.

### Assessment of Responses and Alternative Approaches

Although a number of variations to the original Spatial Planning Areas were suggested there was no consistent justification for any of the suggestions.

The SHLAA has identified limited brownfield land availability in the four largest towns. Restricting the identification of strategic directions for growth only to locations within and around these settlements would limit the opportunity to maximise the re-use of brownfield sites which are located within the spatial planning areas but outside the market towns. Therefore, the alternative considered would not represent the most efficient use of land.

It was therefore decided that the Spatial Planning Areas should remain unchanged. However, it was considered important to be clearer about the implications of the designations.

The principle of identifying clear directions of growth was strongly supported in the initial consultation phase and this was carried through into the presentation of further options in Towards a Spatial Strategy to help provide certainty. Support was expressed for allowing some development in Key Service Centres to help maintain their role and directions of growth were put forward in the further options.

The four main options presented in Towards a Spatial Strategy took into account the policies of the then emerging East of England Plan, which set out an order of preference for locating development in the Cambridge sub-region focusing on land within or on the peripheries of the sub-region's market towns and within key services centres (or on their peripheries), after land within or on the edge of Cambridge and the new town of Northstowe.

All options were based on the housing requirements set out in the emerging East of England Plan up to 2021 and the need to ensure a 15 year supply of housing land after adoption of the DPD as required in PPS3.

Capacity figures for potential housing developments have been identified through the preparation of a Strategic Housing Land Availability Assessment. This was considered necessary to determine whether delivery of the options could reasonably be achieved. The options identified mainly concentrate housing development in the Market Towns and their immediate neighbouring settlements as alternative ways of sustainably accommodating the required growth. A dispersed option was also included in response to known concerns over maintaining the viability of services in villages and anticipated representations proposing development sites in village locations either in response to consultation on the Core Strategy or future consultation on the Planning Proposals DPD.

The Cambridge Sub-region option was considered to have significant merits in terms of a balanced distribution of growth and market attractiveness to help ensure delivery. This option relies heavily on a high proportion of small sites. This will reduce opportunities for substantial contributions to infrastructure improvements, may undermine achievement of targets for affordable housing and renewable energy/ energy efficiency as these are likely to be applicable above certain thresholds. In addition, following further consultation with the Environment Agency it was concluded that a number of potential locations in St Ives were unlikely to be deliverable due to unacceptable risk of flooding. This option was not considered to be the most sustainable and could not be implemented fully.

The Huntingdon Area option was considered to have significant merits, in particular its market attractiveness for employment and retail growth. This option would make use of all known capacity in the Huntingdon area, some of which would be less sustainable than locations elsewhere in the District. A major constraint on this option is the potential impact of traffic generated from this volume of development on the A14 prior to its intended upgrade, or the need to delay significant volumes of development until after this is completed. Following consideration of the environmental capacity of the local area to cope with more growth and congestion the option was rejected as it could not be implemented fully within a reasonable timeframe.

The St Neots Area option was considered to have significant merits not least of all for the potential to master plan a significant extension to the town and the opportunities to ensure comprehensive service provision. Focusing development in St Neots, the southernmost of Huntingdonshire's Market Towns, would further perpetuate the distinction between this area and north and west Huntingdonshire. A particular challenge for this option would be delivery of the level of employment growth included given the market preference for Huntingdon locations indicated in the Employment Land Review. The concerns expressed by respondents about reliance on a small range of greenfield locations were not considered to be insurmountable, but would affect phasing of the strategy if this option were selected.

The Dispersed Option was considered to be generally less sustainable than other options considered, mainly due to greater dependency on car transport. As detailed above for the Cambridge Sub-region, locations in St Ives were discounted due to unacceptable risk of flooding. The Dispersed Option could not be implemented fully and it was discounted due to concerns about how environmentally sustainable the option would be.

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It was considered that aspects of all options except the Dispersed Option would, if carefully phased, be the best combination in terms of sustainability, impact on infrastructure and the environmental capacity of the District. Therefore, this approach was progressed in the Preferred Options.

The additional options for growth generated little consensus although St Neots was favoured over spreading growth across the Cambridge sub-region. There was also a limited amount of support for exploring the possibility of an eco-town with some respondents seeking this as an alternative to any of the options put forward. Given the scale and infrastructure implications of developing an eco-town this is not considered to be a viable alternative for the Core Strategy. It will need to be considered through the wider arena of the RSS review to ensure the most sustainable locations for the potential scale of growth is determined in the regional context.

## Core Strategy Preferred Options

### Wording put Forward for Participation on the Preferred Options

The Huntingdon Spatial Planning Area includes Huntingdon, Brampton and Godmanchester which have a clear physical and functional relationship. Together these settlements have around 31,000 residents (2005). The majority of services and facilities are concentrated in Huntingdon but are accessible to Godmanchester and Brampton by public transport, cycling and walking. The area is a key driver of the local economy, particularly in the retail, leisure and office based sectors. The Housing Land Availability Study (HLAS) identified significant opportunities for development, including previously developed land west of the town centre and at RAF Brampton. The realignment of the A14 and proposed removal of the viaduct over the railway will help facilitate development opportunities after 2015.

The St Neots Spatial Planning Area includes St Neots and Little Paxton and had a combined population of around 31,200 in 2005. Little Paxton has its own distinctive identity and is physically separated from St Neots by the River Great Ouse. However, the key concentration of services and facilities of St Neots town centre are as close to Little Paxton as to many parts of the town itself. Along with land in Bedfordshire around Wyboston, the area is also a key driver of the local economy particularly for the manufacturing and warehousing and distribution sectors. The HLAS identified that this area offers significant opportunities for development especially through the creation of a large sustainable urban extension to the east of the town. The capacity of the A428 is an issue until the section between the A1 and Caxton Gibbet is upgraded to a dual-carriageway.

The St Ives Spatial Planning Area includes the town of St Ives and development at London Road just south of the town in the parishes of Hemingford Grey and Fenstanton. This area is smaller in scale than Huntingdon and St Neots with a population of just under 16,000 in 2005. The area has enjoyed recent employment growth, particularly to the east of St Ives and has a relatively small but thriving retail sector. It offers fewer opportunities for sustainable development options. Flooding is a major constraint to the south of the town. St Ives will see significant improvement in accessibility with the completion of the guided bus route.

The Ramsey Spatial Planning Area includes Ramsey, Bury and part of RAF Upwood, but excludes the small villages of Ramsey Forty Foot, Ramsey Heights, Ramsey Mereside and Ramsey St Marys. The population was around 8,000 in 2005. The town serves as a focal point for a significant rural community. Ramsey has

relatively poor transport infrastructure as it is well off the main road network and is relatively remote and has more limited services and facilities than the other three areas. These factors combine to make this a significantly less sustainable location than the other three spatial planning areas.

## Policy Wording put Forward for Participation on Preferred Options

At least 5450 homes will be provided before 2026 at a rate of at least 550 per year. Of these at least 1575 homes will be on previously developed land and about 3875 homes on greenfield land. About 2150 will be provided as affordable housing. Provision will be monitored regularly and the release of locations will be managed and phased during the plan period with the aims of meeting identified needs and demand and maintaining sufficient supply of deliverable sites.

As part of the overall development strategy to concentrate the majority of growth in the Huntingdon and St Neots Spatial Planning Areas, it is proposed that strategic housing growth will be located:

In the Huntingdon Spatial Planning Area where at least 1800 homes will be provided. Of these, at least 1000 homes will be on previously developed land, about 800 homes will be on greenfield land and about 700 homes will be affordable. Provision will be in the following general locations:

In a significant mixed use redevelopment in the area west of the town centre covered by the Huntingdon West Area Action Plan and redevelopment of previously developed land within the built up area of Huntingdon;

In Brampton on previously developed land; and

In Godmanchester as part of a significant mixed use development to the south east/east after the A14 road improvements have been implemented and on greenfield land to the south west.

In the St Neots Spatial Planning Area where at least 2600 homes will be provided. Of these at least 150 homes will be on previously developed land, about 2450 homes will be on greenfield land and about 1050 will be affordable. Provision will be in the following general locations:

In the first phase of a significant mixed use urban extension on greenfield land to the east of the town and as redevelopment of previously developed land within the built up area of the town; and

In Little Paxton where a small number of homes will be developed.

In the St Ives Spatial Planning Area where at least 500 homes will be provided. Of these, at least 100 homes will be on previously developed land, about 400 homes will be on greenfield land and about 200 will be affordable. Provision will be in the following general locations:

In a significant greenfield development to the west of the town; and

In the redevelopment of previously developed land within the built up area of the town.

In the Ramsey Spatial Planning Area where at least 300 homes will be provided. Of these at least 250 homes will be on previously developed land, about 50 will be on greenfield land and about 100 will be affordable. Provision will be made in the following general locations:

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In an employment led mixed use redevelopments to the west of the town, to the north of the town and as development of land within the built up area of the town.

Outside the Spatial Planning Areas, in the Key Service Centres of Fenstanton, Sawtry and Yaxley, about 250 homes will be provided. Of these at least 75 homes will be on previously developed land, about 175 will be on greenfield land and about 100 will be affordable. Provision will be made in the following general locations:

On land within the built up area and on land to the east and south of Fenstanton;

On land to the west of Sawtry; and

On previously developed land within the built up area of Yaxley.

## Reasonable Alternatives

**.22** Consultation responses tended to focus on promoting individual sites or locations for development. No fundamentally different strategies were put forward. However, some concern was expressed that no clearly defined allowance was made in the policy for non-implementation or delayed delivery. A proposal was put forward that 10% be added to the 5,450 new homes sought which would result in the policy proposing at least 6,000 new homes.

## Summary of Highway Impacts Assessment

**.23** Atkins were commissioned to undertake an assessment of the potential highway impact of the four options put forward in Towards and Spatial Strategy and the Preferred Option. The detailed report is submitted as part of the evidence base (Atkins - Huntingdonshire Spatial Strategy Options Assessment, 2008). The assessment modelled transport scenarios at 2025 assuming that the new A14 alignment is in place by then but with variations to account for the A14 Huntingdon viaduct both being removed or left in place. There are certain parts of the highway network that are expected to experience delays at 2025 before any of the growth associated with the Core Strategy is included. These include:

- the approach roads to St Neots
- northbound on the A1 at Buckden
- B1090 between the A1 and A141
- Kings Ripton Road approach to Huntingdon
- A1123 approach to Huntingdon
- A141 approach to Huntingdon

**.24** With the additional trips associated with the Core Strategy in all five options considered it is these areas of the network that are expected to see the greatest impact and an increase in delays. All the options added delay to the network and in terms of delays no single option stands out as the 'best case' across the network, there are positive and negative aspects to each. A comparison of where on the network there is likely to be an increase in link delay as a result of the additional trips associated with each option has demonstrated that Options A, B,C and D each cause an increase in delay in some part of the network that is worse than any other option. For each of the locations analysed one of the alternative options always generates a greater increase in delay than the Preferred Option. In some areas of the network the Preferred Option performs better than all of the other four options.

.25 The total travel time and vehicle kilometre indicators demonstrate that Option D will generate the most external trips within the traffic network and that Option C has the least impact. However, Option C has the greatest impact on the trunk roads. Again these indicators have shown that there are positive and negative aspects to each option. However, the Preferred Option is relatively consistent in its ranking in the middle of the five options.

.26 The results of the Assessment do not identify a clear best option for the distribution of growth in the Core Strategy. However, in drawing comparisons between the performance of each option it is clear that the Preferred Option performs no worse than any of the other options. Indeed, in some cases the Preferred Option performs better than the alternatives.

## Summary of Draft Final Sustainability Appraisal

.27 All spatial planning areas are considered sustainable with the majority of the SA Objectives being met in a positive way. Growth is directed towards the most sustainable locations, with all available brownfield land used and where greenfield development is necessary, it is achieved in the most sustainable locations in the District. Strategic growth in any of the spatial planning areas will impact upon biodiversity and green infrastructure. Any form of development will have an impact on biodiversity – even in brownfield locations which often sustain high levels of biodiversity. It will be important to ensure that any potential negative impacts are minimised and mitigated against. However, development will also provide opportunities to enhance biodiversity through, for example, design and landscaping. Similarly, the provision of cycle routes, footpaths and bridleways is an important part of Green infrastructure and provides ways to mitigate against habitat fragmentation. Accessibility to key destinations such as a hospital is slightly reduced in the St Neots Spatial Planning area as the town does not have its own hospital, similarly, St Ives does not have a hospital although in the medium term, once the Guided Busway is complete, accessibility to Hinchingsbrooke Hospital will be improved. Pressure may be placed on existing primary services, in all scenarios, although if development is of a sufficient scale it will generate the provision of additional services.

## Summary of Appropriate Assessment

.28 The findings of the Appropriate Assessment concluded that because of the number of homes delivered through the strategic housing policy and settlement hierarchy policies it is not possible to state that the policies would not contribute cumulatively to recreational pressure on Portholme SAC to a damaging degree.

.29 With the re-routing of the A14 it has been concluded that the levels of traffic on the road past Portholme can be expected to decrease or at least remain the same with the new development proposed in policies 2 (strategic housing development), 3 (settlement hierarchy), 7 (employment), 8 (retail) and 10 (infrastructure requirements). It is concluded that the criteria set out in policy 1 sustainable development means that the Core Strategy contains all the measures necessary to ensure that it has done all it can to reduce the likelihood of adverse effects on Portholme.

.30 The AA is unable to state that the Core Strategy is unlikely to have a significant adverse effect on Portholme as a result of increased water abstraction from the River Ouse to service new housing as no standards are proposed against which minimisation of water can be measured.

## Consultation Responses

.31 The Spatial Planning Areas have been identified from evidence in the Strategic Housing Land Availability Assessment which identifies where potential land is located. Their identification has also been informed by the Village Facilities Survey that was carried out as part of preparation for the Settlement Hierarchy Background Paper. Within the Spatial Planning Areas the main focus for growth is within the built up area on brownfield land followed by strategic greenfield sites on the periphery of urban areas. Smaller settlements such as Brampton and

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Godmanchester have been included within the Huntingdon Spatial Planning Area and Little Paxton within the St Neots Spatial Planning Area. These smaller settlements have been included on the basis of their functional relationships to the Market Towns and their proximity to a wide range of accessible services and facilities.

**.32** Some respondents thought that there was a over concentration on development occurring in the Huntingdon and St Neots Spatial Planning Areas and considered that other Spatial Planning Areas and Key Service Centres could sustainably accommodate more growth.

**.33** Policy wording 2 sets out the Council's preferred locations for strategic housing development and includes details on where this is to be located. It generated a very high response rate with 119 responses in total. Of these, around 80 indicated that they opposed the policy, this equates to about 67% objecting to the policy as it is currently worded. Some respondents did identify minor word changes that were needed in order to make it more sustainable. However, a vast majority of responses raised a number of issues which have been taken into account in the submission Core Strategy. A significant number of representations made reference to the fact that the relationship between the strategic housing policy (P2) and the settlement hierarchy (P3) is not clear. A clearer explanation was sought on how the Spatial Planning Areas and Key Service Centres had been identified and how the Council had identified the levels of growth proposed in each area. A number of objectors also considered that the assessment of alternatives in Volume 2 was inadequate and needed a better explanation of how these alternative options had been identified and why they had been rejected. A number of respondents considered the evidence on which the Council is basing their housing requirements on to be inadequate and proposed that the Council should be planning for high levels of housing growth. Related to this, a number of respondents also suggested that more explanation needs to be given on how the Council has derived its figures with detailed information on, for example, existing commitments and allocations within the policy. Further clarification on the delivery of some sites was also sought, with a general consensus for more information on the phasing and timing of development.

**.34** There were a number of representations which promoted specific sites and a number of comments gave detailed information about these particular sites. It was apparent that people were confused about the level of growth that is proposed for Little Paxton as it is referenced in policy wording 2, yet no indicative arrow is provided on the key diagram. People also sought more growth in particular settlements with a number of respondents suggesting that more growth in St Ives is needed because of the guided busway. Others suggested that more growth is needed in Ramsey to stimulate regeneration - however a number of respondents did oppose the level of growth in Ramsey purely because of the lack of infrastructure that the town has and its location outside of the Cambridge Sub-Region. Similar arguments were presented for Sawtry, with some respondents supporting the growth proposed and suggesting that more can be accommodated, whilst others objected to the level of growth proposed. A number of respondents also commented on growth proposed to the south east of Godmanchester. Again, comments on this site were mixed, with some supporting it and others arguing that it is unsustainable.

**.35** Consultation responses indicated that there had been insufficient consideration given to how the alternatives had been identified and why they had been rejected. Issues that were also raised through consultation concerned a lack of clarity over how policy wording 2 and policy wording 3 relate and that more information needs to be given on how the levels of proposed growth were arrived at as well as existing commitments. The reasonable alternatives assessed below concern how the policy can be strengthened.

## Assessment of Responses and Alternative Approaches

As a result of representations made for preferred options consultation the Council has sought to strengthen the existing strategic housing development policy. It is acknowledged that insufficient information on the evidence base that underpins this policy was given for Preferred Options and that the information given on existing commitments was not clear enough. This has been addressed within the strategic housing development policy in the Submission Core Strategy.



The overall target figure of 5,450 is put forward as a minimum in accordance with the approach in the RSS therefore it is not considered necessary to increase the requirement. As the SHLAA has identified more than adequate sites to ensure delivery of this number no allowance is made for windfall sites in accordance with PPS3. It is reasonable to expect that small sites will continue to come forward through normal planning application processes and will add to the total number of new homes delivered.

To clarify the reasons why reasonable alternatives have been rejected further details have been incorporated within this volume and in the draft Final Sustainability Appraisal. The Council maintains that the strategic housing development policy put forward in the submission Core Strategy is the most sustainable for the District. The Issues and Options consultation undertaken by the Council was comprehensive and looked at all the reasonable alternatives that were available to the Council. It has been made clear how the Issues and Options consultation has informed preparation of the Preferred Options in the draft Final Sustainability Appraisal. This volume sets out further information on how the Preferred Options consultation has informed preparation of the Submission Core Strategy. It should be read alongside the Final Sustainability Appraisal which also outlines how the consultation process has influenced plan preparation.

## Changes Made

Further information on how Key Service Centres have been identified has been included in the supporting text which responds to a number of concerns that too much emphasis has been placed on urban areas.

The policy wording has been amended to identify clearly the number of completions from 2001-2006 and from 2006-2026 the number of dwellings that have either full or outline planning permission as well as the number of dwellings that will come from existing Local Plan allocations. It also sets out the total number of homes that the District will be providing from 2001-2026. This was in response to concerns that insufficient information regarding existing commitments had been included and that the Council were planning for too few homes. The policy also clearly sets out the number of homes that will be provided on previously developed land and those to be provided on greenfield land. The reference to Little Paxton has been removed.

The supporting text has been enhanced to explain the role of the SHLAA in identifying potential capacity and continuing contribution of small and moderate scale developments. In addition a clearer definition of the built up area is given.

## Tests of Soundness

**.36** There are a number of uncertainties that have been taken into account which centre around the availability of locations for development. A number of locations are dependant on decisions concerning the redundancy of military bases, while others are dependant on changes to the A14 and the local road network. The Preferred Approach is considered to be sufficiently flexible that these uncertainties will not undermine delivery of the objectives in this policy area.

**.37** Go East did not comment on policy wording 2.

## Approach Taken

**.38** The approach taken is detailed in Volume 1 on page x.

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## Settlement Hierarchy

**Table 5 Key Sources for the Settlement Hierarchy**

National	PPS1: Delivering Sustainable Development PPS1 Supplement: Planning and Climate Change PPS3: Housing PPS7: Sustainable Development in Rural Areas
Regional	East of England Plan
Local	Housing Land Availability Study (HLAS) (2007) updated and adapted to form Strategic Housing Land Availability Assessment (SHLAA) (2008) Settlement Hierarchy Background Paper Update (2007) Huntingdonshire Community Strategy (2004) Sustainable Community Strategy for Huntingdonshire (2008)

## Core Strategy Issues and Options

### Issues and Options Identified for Consultation

Issue 5: The need to define an appropriate settlement hierarchy to manage non-allocated growth in different types of location.

Option 9: The Core Strategy will need to identify a settlement hierarchy for use in determining the scale of non-allocated development appropriate in different locations.

The hierarchy could:

- identify Huntingdon, St Neots, St Ives and Ramsey and Bury as 'Market Towns'
- identify Brampton, Buckden, Fenstanton, Godmanchester, Kimbolton, Little Paxton, Sawtry, Somersham, Warboys and Yaxley as 'Key Service Centres'
- List other villages as 'Smaller Settlement'

Question 8: Do you agree with the overall approach taken to the settlement hierarchy?

Question 9: Do you agree with the identification of Huntingdon, St Neots, St Ives and Bury as 'Market Towns'?

Question 10: Do you agree with the identification of Brampton, Buckden, Fenstanton, Godmanchester, Kimbolton, Little Paxton, Sawtry, Somersham, Warboys and Yaxley as 'Key Service Centres'?

### Issues and Options Identified for Consultation

Issue 9: To identify the appropriate scale of housing permissible on unallocated sites to ensure development is concentrated in sustainable locations.

Option 28: Policies will define the scale of housing development of different types. This could be defined as:

- Major development: 60 or more dwellings
- Moderate development: 10-59 dwellings
- Minor development: up to 9 dwellings
- Residential infilling: development of a small site within the built-up framework or defined limits of a settlement by up to three dwellings.

Option 29: Policies need to define the location of development of differing scales. This could be that housing development on unallocated sites could be limited to the following:

- within the defined limits of Market Towns: major, moderate and minor housing development, and residential infilling
- within the defined limits of Key Service Centres: moderate and minor housing development, and residential infilling
- within the built-up framework of Smaller Settlements: residential infilling
- within the countryside: limited and specific forms of housing development with an essential need to be in the countryside

Question 32: Do you agree with the four categories suggested for scale of housing growth?

Question 33: Should any other categories be considered and if so, what should these be

Question 34: Do you agree with the level of development permissible in:

- a. Market Towns;
- b. Key Service Centres;
- c. Smaller Settlements; and
- d. the countryside?

Question 35: Should minor development proposals of up to 9 dwellings be permitted in Smaller Settlements where it can be demonstrated that the settlement concerned offers at least a basic range of services and public transport appropriate to the form of the housing to be provided and it secures the most sustainable solution for the site?

Question 36: Are there any other options that should be considered?

## Reasonable Alternatives

**.39** The hierarchy could be changed in a number of ways to facilitate a wider or more restricted distribution of growth. This was an issue which raised significant responses to consultation on the original submitted Core Strategy (April 2006). Various suggestions have been raised involving more or less different categories within the hierarchy. A significant alternative is the previously proposed distinction between two categories of Key Centre in an attempt to distinguish further between additional growth and ease of access to shops, services and employment facilities.

**.40** A further alternative is to base the settlement hierarchy on the physical capacity of different settlements to accommodate growth, taking into account their form, character and land availability, rather than access to services and facilities. However, this would not ensure that national and regional policies to reduce the need to travel are being addressed most effectively.

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.41 In the previously submitted Core Strategy just three categories of housing development were proposed: major - 10 or more dwellings, minor - up to 9 and infill up to 3. This could be simpler to interpret, but allows less flexibility. A significant number of representations opined that the major category was too broad and the minor category too restrictive. However, the definitions of each category could be changed in many different permutations.

.42 The previously submitted Core Strategy proposed two categories of Key Centre and allowed for major development proposals in the larger of these. This made no distinction between the scale of development permissible in Market Towns and the six largest Key Centres. A greater amount of development could be permitted in Key Service Centres by allowing major housing schemes and in Smaller Settlements by allowing minor housing schemes in some or all of them. Either approach would lead, particularly in the case of allowing major development in KSCs, to a more dispersed form of development contrary to strategic policies which require most new housing to be located in larger settlements. There is no evidence, particularly for minor development that greater dispersal would have a significant effect in retaining village facilities, and additionally it would be likely to increase the need to travel. Encouragement of greater levels of development in the countryside would be contrary to national guidance.

## Summary of Initial Sustainability Appraisal of Issues and Options

.43 Option 9 outlines a hierarchy of settlements based on current size and accessibility to existing services and amenities. This option ensures that growth is located in the most sustainable locations and is consistent with national and regional guidance to reduce the need to travel. It directs growth towards town centres which will promote their viability and vitality.

.44 Two reasonable alternatives were proposed. The first proposes additional development in rural areas by designating more growth centres. This could contribute to affordable housing provision where there is a need and promote employment opportunities for rural areas. However, it could lead to growth being spread out too thinly which may affect settlement character and dispersed growth may generate more car dependency.

.45 The second reasonable alternative proposes that the settlement hierarchy could be based on the physical capacity of settlements to accommodate growth rather than access to services and facilities. This was considered the least sustainable in terms of reducing the need to travel as it only takes into account the physical capacity of settlements to accommodate growth - not access to services and facilities.

.46 Option 9 was considered to be more sustainable than the reasonable alternatives.

.47 Defining the scale of housing growth in terms of major, moderate, minor and infill was considered to be more flexible in relating the scale of housing development to the settlement hierarchy and therefore able to facilitate better integration of new development with the existing built form. This option was favoured over the reasonable alternative which proposed a more limited number of categories.

## Consultation Response to Issues and Options

.48 There was general support for the preferred approach and a recognition of the need to include a settlement hierarchy in the Core Strategy. There was also support for the suggestion of a single category of Key Service Centre, removing the previous distinction between potential and limited growth. Most objections related to requests to move particular villages into the potential Key Service Centres category. Examples cited include Stilton, Farcet and Earith.

.49 There was a considerable amount of uncertainty about the definition of scales of growth to guide suitability in specific types of location. A number of respondents did not see a distinction between the scale of growth that is allocated and that which would be considered acceptable from windfall development. It was thought by a number of respondents that the levels were arbitrarily drawn up. Others raised concerns about situations that might arise

where sites that would generally be considered suitable for a level of development were just above that which was proposed as appropriate for the location. Although the responses were varied there was support for the principle of setting levels of development for different locations.

## Assessment of Responses and Alternative Approaches

**.50** The definition of Key Service Centre was taken from the emerging East of England Plan. This makes no allowance for the alternative approach of distinguishing between settlements with different levels of services and facilities as put forward in the alternative approach. The Settlement Hierarchy background paper indicates a clear distinction in the level of services and facilities available in the villages suggested to be Key Service Centres than in others. Although there is some variation in this it can be addressed through consideration of a particular Key Service Centre's potential for strategic growth.

**.51** It was considered that the variation in responses to consultation indicated that the levels identified were about right. The uncertainty, however, showed that it would be important to explain more clearly how the scales of growth would work with the other parts of the Spatial Strategy. To facilitate a clearer explanation it was decided to combine the scales of growth with the Settlement Hierarchy.

**.52** To enable a better response to site specific circumstances and to reflect the variation in the level of services and sustainability of the many villages in the Smaller Settlements category, greater flexibility needed to be introduced.

## Core Strategy Preferred Options

### Policy wording put Forward for Participation on Preferred Options

The hierarchy identifies:

Huntingdon, St Neots, St Ives and Ramsey and Bury as 'Market Towns' in which development schemes of large, moderate and minor scale will be appropriate;

Brampton, Buckden, Fenstanton, Godmanchester, Kimbolton, Little Paxton, Sawtry, Somersham, Warboys and Yaxley as 'Key Service Centres' in which development schemes of moderate and minor scale will be appropriate

The following villages as 'Smaller Settlements';

Abbotsley, Abbots Ripton, Alconbury, Alconbury Weston, Alwalton, Bluntisham, Brington, Broughton, Buckworth, Bythorn, Catworth, Chesterton, Colne, Conington, Covington, Diddington, Earith, Easton, Ellington, Elton, Farcet, Folksworth, Glatton, Grafham, Great Gidding, Great Gransden, Great Paxton, Great Raveley, Great Staughton, Great Stukeley, Hail Weston, Hamerton, Hemingford Abbots, Hemingford Grey, Hilton, Holme, Holywell, Houghton and Wyton, Keyston, Kings Ripton, Leighton Bromswold, Little Stukeley, London Road (St Ives)<sup>(2)</sup>, Molesworth, Needingworth, Offord Cluny, Offord D'Arcy, Oldhurst, Old Weston, Perry, Pidley, Pondersbridge (part)<sup>(3)</sup>, Ramsey Forty Foot, Ramsey Heights, Ramsey Mereside, Ramsey St Mary's, Southoe, Spaldwick, Stibbington, Stilton, Stonely,

2 The built up area adjoining London Road to the south of St Ives, and lying within the parishes of Fenstanton and Hemingford Grey

3 The greater part of this settlement lies within the neighbouring Authority (Fenland)

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Stow Longa, Tilbrook, Toseland, Upton, Upwood, Wansford (part)<sup>(4)</sup>, Waresley, Water Newton, Winwick, Wistow, Woodhurst, Woodwalton, Wyton-on-the-Hill, and Yelling; in which residential infilling will be appropriate. In exceptional circumstances, development schemes of minor scale may be allowed where it can be demonstrated that the settlement concerned offers at least a basic range of services and public transport appropriate to the form of the housing to be provided and it secures the most sustainable solution for the site;

All other areas as part of the countryside, including those hamlets and isolated groups of buildings where nearly all services and facilities must be accessed in higher order settlements. In this tier residential development will be limited to that which has an essential need to be in the countryside.

The scale of housing development schemes is defined as:

Large scale development: 60 or more dwellings

Moderate scale development: 10-59 dwellings

Minor scale development: up to 9 dwellings

Residential infilling: up to 3 dwellings

## Reasonable Alternatives

**.53** Responses to consultation on the Preferred Options indicated that there was insufficient detail given as to how housing categories have been identified and settlements have been positioned in the hierarchy. The following reasonable alternatives have been identified and are discussed in more detail below:

- A distinction made between more or less sustainable key service centres, with more sustainable centres being able to accommodate a greater level of growth
- A criteria based policy based on the services available within the settlement
- Different scales of housing development including more scales or fewer scales

## Summary of Draft Final Sustainability Appraisal

**.54** This policy approach aims to steer development towards those locations where it will improve the sustainability and vitality of communities in proportion to their size and accessibility. Implicitly it aims to improve the attractiveness of the largest centres to reduce the loss of services and employment to Peterborough and Cambridge.

## Summary of Appropriate Assessment

**.55** This policy could not be screened out due to the impact of new housing development partially delivered through this policy. Although not referenced in relation to any one particular site, it is considered that the cumulative effects arising from this and other policies could result in significant effects on some of the sites assessed.

## Consultation Responses

**.56** The proposed policy generated a high response rate with 83 in total. Of these roughly 66% clearly objected to some aspect of the policy. There was broad support for the designation of the four Market Towns and for the principle of having Key Service Centres. However, there were varied opinions over which settlements should qualify for Key Service Centre status. In particular, a number of respondents objected to the inclusion of Fenstanton,

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4 The greater part of this settlement lies within the neighbouring Authority (Peterborough)

Warboys and Buckden as Key Service Centres. Others suggested that other settlements, particularly Hemingford Grey, Holme and Great Gransden, should be designated Key Service Centres. Furthermore, a number of respondents also suggested that the Key Service Centres be subdivided according to their accessibility to services and size, and that those which are more sustainable be permitted more growth.

**.57** A recurrent theme raised was the lack of explanation provided for the scale of housing growth categories with concerns that they were arbitrary and overly restrictive. Allied to this were comments that differing levels of growth should be allowed in different smaller settlements according to their individual level of services and accessibility to higher order centres. There was quite significant support for greater flexibility for developments of up to 9 homes in smaller settlements to respond to site specific circumstances.

**.58** Another issue that was raised concerned the proposed deletion of settlement boundaries. Although this issue is not specifically referred to in policy wording 3 and will be dealt with within the Development Control Policies DPD, a number of respondents opposed their proposed deletion as suggested in the Settlement Hierarchy Background Paper.

**.59** Respondents also considered the policy to be inflexible and not facilitating making efficient use of land as a result of the housing categories. Other respondents suggested that growth for Key Service Centres such as Warboys be included in the Key Diagram. Another respondent suggested that reference to RAF Brampton should not be included in the Core Strategy as it is not certain that the site will be available for redevelopment. One respondent indicated that the reliance on the Housing Land Availability Study as the main source of evidence was inappropriate.

## Assessment of Responses and Alternatives

It was apparent from the responses that people felt the categories put forward relating to the scale of housing development that might be allowed in different locations were arbitrary and that insufficient explanation as to how they had been identified had been given. It was also clear that the scales were considered to be overly prescriptive. In particular a number of respondents suggested that a distinction should be made between those settlements capable of accommodating more development. This was the approach taken for the Core Strategy that had to be withdrawn and, although responses received during each consultation stage for the previous Core Strategy cannot be considered in the context of current plan preparation, it was evident that separating settlements, particularly key service centres, in this way was not popular. The Council therefore considered making a distinction between settlements in this way to be inappropriate.

Throughout the various stages of consultation for the Core Strategy there was consensus that development should be appropriate to the settlement; that it should not be so significant that it damages the character of the settlement or places a burden on local services and facilities that would potentially undermine them. To this end the hierarchy was drawn up to categorise the different types of settlement in the district. In addition to this, different scales of development were considered for the different levels of the hierarchy. This has proved a difficult area to find consensus on, however the Council believes that the scales now represent the best compromise. In combination with the flexibility offered by the policy to allow for unforeseen sites that offer opportunities for sustainable development to come forward it is considered to ensure that development is appropriate to its location.

A number of different respondents suggested that settlements be re-classified. As part of the evidence base being put together for the Core Strategy, the Council updated the Settlement Background Hierarchy Paper in 2007. Although a number of changes to the hierarchy were carefully considered, on the basis of regional guidance in the East of England Plan, it was decided that the hierarchy should remain as it is.

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The Council decided not to include a criteria policy based on the services available as, although being potentially more flexible, it would not provide sufficient certainty to developers or applicants. It would also have the potential to undermine local service provision and could be damaging to settlement character.

Reducing the number of categories in the scale of housing development would be in line with the definition of major and minor development as offered in the GDPO (as amended 2006). However, it was felt that this would be too vague and not provide sufficient guidance for applicants. It was considered that additional categories, although potentially providing more flexibility, would risk further confusion.

The Council considers that the policy in the Submission Core Strategy is sound and reaches a compromise that reflects issues raised during the consultation process. It is clear that no consensus will arise as to the position of settlements in the hierarchy or how it should be structured but that the policy put forward reaches a sustainable compromise.

## Changes Made

The policy has been strengthened by giving further clarification on where development can take place. Reference to the built-up area is included in the policy wording as is more information on development in hamlets and isolated groups of villages with reference being made to restrictions for development in the countryside and cross reference to the Development Control Policies DPD. An emphasis has been placed on the need for access to services to higher order settlements in such cases where development may be permitted.

An additional paragraph has been added to provide greater flexibility over the scale of development permitted in different categories of settlement. The indicative nature of the scale for housing development has been emphasised in response to a number of comments suggesting that the categories are too prescriptive to take into account locational and site specific circumstances.

## Tests of Soundness

**.60** There are no particular concerns with compliance with the Tests of Soundness.

**.61** Go East indicated that the figures provided in policy wording for scales were too prescriptive. It was recommended that the submission Core Strategy provide indicative figures for the scales large, moderate, minor and infill.

## Approach Taken

**.62** The approach taken is detailed in Volume 1 on page **x**.

## Addressing Housing Need

**Table 6 Key Sources for Affordable Housing**

National	PPS1: Delivering Sustainable Development PPS1 Supplement: Planning and Climate Change PPS3: Housing Delivering Affordable Housing Good Practice Guide (DCLG)
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	PPS7: Sustainable Development in Rural Areas, Circular 05/2005 (Planning Obligations) Homes for the future, more affordable, more sustainable - Housing Green Paper (DCLG, 2007)
Regional	East of England Plan Cambridge Sub Region Strategic Housing Market Assessment (2008)
Local	Housing Land Availability Study (HLAS) (2007) updated and adapted to form Strategic Housing Land Availability Assessment (SHLAA) (2008) Huntingdonshire Community Strategy (2004)  Sustainable Community Strategy for Huntingdonshire (2008) Developer Contributions Towards Affordable Housing SPD - Consultation Draft (June 2007), Huntingdonshire Housing Strategy 2006-2011, Huntingdonshire Housing Needs Survey 2002 and Update 2006 Local Plan Alteration 2002 policy AH4

## Core Strategy Issues and Options

### Issues and Options identified for consultation

Issue 10: The need to set target(s) and thresholds for affordable housing that reflects local circumstances.

Option 30: Policies will set a target of 40% of all housing on eligible sites throughout the District to be provided as 'affordable housing'.

Option 31: Thresholds could be set only requiring the provision of affordable housing on sites for 15 or more houses wherever they are located.

Option 32: Thresholds could be set requiring the provision of affordable housing on sites categorised as major or moderate development wherever they are located.

Option 33: Policies could set a threshold for seeking affordable housing on development sites of less than 15 houses in Smaller Settlements.

Question 37: Do you agree that a target should be set of seeking 40% of all housing on eligible sites throughout the District to be provided as 'affordable housing'?

Question 38: Which option do you prefer and why?

Question 39: Do you think a threshold should be included for seeking affordable housing on sites of less than 15 houses in Smaller Settlements? If so what should be the minimum site size eligible for seeking affordable housing?

### Reasonable Alternatives

**.63** Targets could be set at 40% within the Cambridge sub-region and 30% within the rest of the District of the total number of dwellings on eligible developments. The average target of 35% included in the Regional Spatial Strategy could be used but this is an average for the region and within Huntingdonshire the need for affordable

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homes is greater than elsewhere in the region. A further variation would be to increase the target to 50% for the Cambridge sub-region and 40% elsewhere. This would bring Huntingdonshire in line with the targets sought in South Cambridgeshire and Cambridge City and have the advantage of promoting a consistent approach throughout the wider area.

**.64** PPS3 sets a national indicative minimum site size threshold of 15 dwellings. Policies are required to set thresholds to determine whether sites should be eligible to provide affordable housing. The higher the threshold is set the lower the potential for achieving affordable housing because fewer sites will be eligible to contribute. However, the need for affordable housing has to be balanced with the viability of its provision.

**.65** Many permutations could be developed of site size threshold and different types of location. In particular, it may be appropriate to relate the thresholds for seeking affordable housing to the scale of development permissible in different categories within the settlement hierarchy. Option 31 above adheres strictly to PPS3 guidance with no recognition of local circumstances. Option 32 attempts to respond to the high level of local need for affordable housing and the concentration of housing development in Market Towns and Key Service Centres as the only locations where it is suggested that developments of 10 or more houses will be permitted.

**.66** PPS3 also states that lower thresholds can be set where viable and practicable, including in rural areas. This would be in addition to any affordable housing from 'rural exceptions' sites allowed solely for affordable housing in small rural communities. Policies could set a threshold for seeking affordable housing on development sites of less than 15 houses in Smaller Settlements. The previously submitted Core Strategy suggested a minimum site size threshold of 3 dwellings to try to generate provision of some affordable housing on infill sites within Smaller Settlements. A number of concerns were expressed over the viability and management implications of providing affordable housing at such a low threshold. However it is considered that this will be both viable and practical.

## Summary of Initial Sustainability Appraisal of Issues and Options

**.67** Option 30: the target of 40% of housing provision to be affordable on eligible sites was considered to be the most deliverable option compared to the two other reasonable alternatives. Reasonable alternative 1 suggested that 50% of housing on eligible sites to be affordable. Although this would facilitate the biggest contribution to affordable housing provision it was not considered to be realistic for the District and may impact upon the viability of delivering sites for development. Reasonable alternative 2 suggested that a lower target of 30% could be set. This was considered to be more deliverable than reasonable alternative 1, but would make a significantly lower contribution towards meeting the need for affordable housing in the District.

**.68** Option 31: the requirement of affordable housing on sites of 15 or more dwellings was considered to be the most appropriate for the District and is consistent with national guidance. Setting a lower threshold, as proposed in Option 33 may have the potential to emphasise social divisions between affordable and market housing on the same site.

## Consultation Responses to Issues and Options

**.69** Respondents' opinions on the provision of affordable housing within development schemes were very diverse. Some supported the 40% target, others wanted it tempered with considerations of site specific conditions and viability. A number of respondents proposed a target of 35% arguing that this would be in line with the emerging Regional Spatial Strategy. A few respondents thought the target should await completion of the Strategic Housing Market Assessment. Seeking affordable housing provision within any developments over the threshold of 15 dwellings was broadly accepted. However, provision at a lower threshold within Smaller Settlements provoked a

split in responses between parish councils who were keen to see affordable housing provided within any developments in their villages and developers/ landowners who objected to the lower threshold citing concerns over viability.

## Assessment of Responses and Alternative Approaches

**.70** A number of respondents sought a target of 35% affordable housing provision arguing that this would be in accordance with the emerging RSS. The emerging RSS looks for 35% of housing coming forward to be affordable. However, affordable housing cannot be sought on all developments as some are below the appropriate site size/ numbers threshold. Therefore, to achieve 35% of all development as affordable housing a higher proportion needs to be achieved on eligible sites to counter-balance the lack of provision on ineligible sites.

**.71** One of the alternative approaches considered would involve seeking a 50% contribution of affordable housing on eligible sites in line with South Cambridgeshire and Cambridge City. However, the housing market in Huntingdonshire differs from that in South Cambridgeshire and Cambridge City with comparable properties being significantly less expensive in Huntingdonshire than is typical in these areas and so this approach would not reflect the variation in house and land prices. The initial Sustainability Appraisal raised concerns over the viability of seeking this proportion and its potential impact on delivery of new affordable homes.

**.72** Another alternative would be to maintain the current distinction between the Cambridge sub-region and the north and west of Huntingdonshire. However, the Housing Needs survey update indicated a decrease in the discrepancy between house prices in the two areas coupled with clear indications of high levels of need for affordable housing throughout the district. Hence, this distinction is not considered to be justified.

**.73** The use of a lower threshold at which to seek affordable housing in smaller settlements resulted in a split in responses between those living in such places who typically saw the need for provision of affordable housing to help their communities and potential developers who were concerned about viability. PPS3 allows for the use of lower thresholds but at the same time requires account to be taken of factors such as viability. The preferred approach recognises the impact of site specific conditions on the provision of affordable housing.

## Core Strategy Preferred Options

### Policy Wording put forward for participation on Preferred Options

The definition of Affordable Housing in PPS3 will be used.

40% of all housing proposed in developments in the following categories should be provided as affordable housing:

on proposals of 15 or more homes or 0.5ha or more in all parts of the District; or

on proposals of 3 or more homes or 0.1ha, in all parishes with less than 3000 population.

In order to prevent avoidance of contributions the requirement will consider the complete developable area rather than the area or number of homes of a proposal where it forms a sub-division of a larger developable site.

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In determining the amount of affordable housing, site conditions including redevelopment of previously developed land or mitigation of contamination will be considered. Where evidence shows that site conditions or other material considerations may affect the amount of affordable housing, criteria will set out the priorities for achieving affordable housing. Similarly criteria will be set for the form the contribution should take and the circumstances in which these may be varied.

## Reasonable Alternatives

.74 No new reasonable alternatives were identified.

## Summary of draft Final Sustainability Appraisal

.75 The proposal addresses one of the key components of the government's policy on sustainable communities whilst reflecting local conditions. Further guidance is available in the SPD Developer Contributions Towards Affordable Housing.

## Consultation Responses

.76 Approximately 65% of respondents objected to this policy. The primary issue raised was the lack of an evidence base to propose a 40% target which is not in conformity with the 35% proposed in the East of England Plan. Furthermore, it was considered by a number of respondents that the proposed thresholds for affordable housing provision in smaller settlements are too low and will affect viability of developing such sites. A number of respondents suggested that it was inappropriate to set a target in advance of the final publication of the Cambridge Sub Region Strategic Market Housing Assessment. One respondent suggested that no definition of affordable housing had been provided and another suggested that the policy should include reference to "villages" not "parishes." A number of respondents suggested that the policy needs to clearly reference the 'Developer Contributions Towards Affordable Housing SPD' and that clarification on criteria that set priorities for achieving affordable housing need to be included in the policy wording. A couple of respondents also identified that the policy reference to contributions appears to be inconsistent with the policy on infrastructure (policy wording 10) later in the document. One respondent also indicated that the policy or supporting text also fails to specify targets for social rented or intermediate housing provision.

## Assessment of Responses and Alternatives

It was very clear that a significant number of respondents objected to the policy arguing that it is not in conformity with the proposed target in the RSS. The RSS now identifies a target for some 35% of housing coming forward through planning permissions granted after publication of the RSS to be affordable. Given that a proportion of housing sites are ineligible for seeking affordable housing on this deficit must clearly be made up through higher proportions of affordable housing on other sites. The Council considers that the assessment of alternatives is sufficient and, furthermore, that the proposed target of 40% is supported by the Cambridge Sub Region Strategic Market Housing Assessment.

A number of respondents identified that the Council had not included targets for social rented or intermediate housing provision which needs rectification. It is accepted that additional information needs to be included on the priorities for achieving affordable housing provision. It is also accepted that the policy should refer to separate targets for social rented and intermediate housing targets.

### Changes made

The policy has been modified to identify targets for social rented and intermediate housing provision. The Development Control Policies DPD, Huntingdon West Area Action Plan DPD and Planning Proposals DPD are clearly signposted as future sources of more detailed guidance. Reference is also made to the Developer Contributions Towards Affordable Housing Provision SPD. The requirement for the complete developable area to be considered as a whole to prevent avoidance of contributions has been moved to the infrastructure and implementation chapter as it applies to more than just affordable housing.

### Tests of Soundness

**.77** Through the consultation on Issues and Options the Council looked at consistency with neighbouring authorities. The Reasonable Alternatives included consideration of a target of 50% for the Cambridge sub-region and 40% elsewhere. This was considered as it would bring Huntingdonshire in line with the targets sought in South Cambridgeshire and Cambridge City. It would also have the advantage of promoting a consistent approach throughout the wider area. However, the Council is concerned that the housing market in Huntingdonshire differs from that in South Cambridgeshire and Cambridge City and that this approach would not reflect the differences in the housing market. The Council is satisfied that there is robust evidence that justifies the Preferred Approach and that it would not be appropriate to set a higher percentage.

**.78** Go East identified that the policy failed to set separate targets for social rented and intermediate housing or adequately set out the approach for seeking developer contributions or type and size of housing. Despite further detail provided in the SPD Developer Contributions towards Affordable Housing, Go East recommended that the policy in the Core Strategy should provide an indication of what the criteria are for material considerations affecting the provision of affordable housing or reference where they can be found. These have been addressed in the submission policy.

### Approach taken

**.79** The approach taken is detailed in Volume 1 on page x.

## Rural Exceptions Affordable Housing

**Table 7 Key Sources for Rural Exceptions Housing**

National	The Housing Act 1996 Statutory Instrument 1997/623 PPS3: Housing Delivering Affordable Housing (DCLG 2006) PPS7: Sustainable Development in Rural Areas (ODPM 2004)
Regional	East of England Plan Cambridge Sub Region Strategic Housing Market Assessment (2008)

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Local	Housing Land Availability Study (HLAS) (2007) updated and adapted to form the Strategic Housing Land Availability Assessment (SHLAA) (2008) Huntingdonshire Housing Needs Survey (2002) and Update (2006)  Huntingdonshire Housing Strategy 2006-11 (2006)  Huntingdonshire Site Assessment (LDA Design, 2006)  Huntingdonshire Community Strategy (2004) Sustainable Community Strategy for Huntingdonshire (2008)
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## Core Strategy Issues and Options

### Issues and Options Identified for Consultation

Issue 11: The need to provide affordable housing in Smaller Settlements to meet local needs.

Option 34: Policies will set out criteria to assess proposals in locations or on a scale that would not otherwise be acceptable where the development is solely to provide affordable housing to meet local needs.

Question 41: Should the provision of affordable housing be allowed in locations and on a scale that would not otherwise be permitted for general housing where it is solely to provide for local needs?

Question 42: Should 'rural exceptions' housing be concentrated in settlements with at least a basic level of services or should it be encouraged wherever there is need?

Question 43: Should sites for 'rural exceptions' housing be allocated in the Planning Proposals DPD?

### Reasonable Alternatives

**.80** No allowance could be made for 'rural exception' sites, but this would not enable identified needs for affordable housing in rural areas to be addressed.

**.81** Exception sites could be allowed at all rural settlements, regardless of the level of facilities available within them. However, this would mean that some residents of the new properties would not have easy access to a basic level of services and facilities, increasing their need to travel which would be contrary to the need to promote a more sustainable pattern of development.

### Summary of Initial Sustainability Appraisal of Issues and Options

**.82** Option 34: sets out criteria for rural exception sites. This offers flexibility to affordable housing policies and benefits in keeping workers close to the land and in the local community rather than transplanting them to urban areas to receive affordable housing. This option conforms to policy on sustainable settlements. There were two reasonable alternatives identified - exceptions sites could be allowed in all rural settlements or no provision could be made for rural exception sites. Both of these options are contrary to policy on sustainable settlements and the former option may result in an increased need to travel as provision would be allowed in all rural settlements, regardless of access to facilities or services.

## Consultation Responses to Issues and Options

.83 General support was expressed for allowing rural exception sites of a scale appropriate to respond to identified local needs. However, concern was expressed over the sustainability implications of allowing rural exceptions housing to be built in any settlement. A balance was generally sought between the desirability of responding to identified local needs with the need for future residents to be able to access services.

### Assessment of Responses and Alternative Approaches

.84 The Preferred Approach responds to the consensus of comments received and sets out the criteria for affordable housing development on exceptions sites. It seeks a balance between ensuring that there are a basic level of services and allowing exceptions development in a broad range of locations that would benefit from an appropriate level of affordable housing.

## Core Strategy Preferred Options

### Policy Wording put forward for participation on Preferred Options

In exceptional circumstances, affordable housing development will be considered acceptable within or adjacent to the built up areas, subject to the following criteria:

The proposal is limited in number and type of housing to that which can be justified by evidence of need for affordable housing arising from people who are either currently resident, have an existing family or employment connection or have some other unambiguous local connection in the parish or individual settlement;

The settlement is a small rural community that is below 3000 population(vii) that offers at least a basic range of services appropriate to the form of housing to be provided;

Appropriate safeguards are put in place that ensure that the housing will remain affordable for successive occupiers; and

It can be demonstrated that there is no land in a more suitable location that is available.

## Reasonable Alternatives

.85 Responses to consultation on Preferred Options indicated that insufficient assessment to alternatives had been given. The following reasonable alternatives have been identified through the consultation process and are assessed below:

- Rely on national guidance (PPS3, para 30)
- Strengthen the existing policy

## Summary of draft Final Sustainability Appraisal

.86 This policy approach is sustainable and reflects local conditions. By providing opportunities for local people to live in affordable houses and work in rural communities it will reduce the need for people to live in larger settlements away from their family and employment opportunities. Provision of affordable housing based on need may also help generate the critical mass needed to sustain local services thereby improving the vitality of the rural economy.

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## Consultation Responses

.87 9 out of 16 respondents clearly objected to the policy. The two general issues that have been raised from these responses concern a lack of substantiated evidence to justify the policy and that it repeats national policy in PPS3 and is therefore not locally specific. Other respondents suggested that an additional criteria relating to impact on the historic environment is required and that rural exceptions should be allocated in the Planning Proposals DPD.

### Assessment of Responses and Alternative Approaches

As a result of consultation on preferred options further assessment of alternatives was required. It was suggested by Go East that the preferred policy is not locally specific. As such the Government Office suggested that the Council could rely on national guidance and include a statement to that effect. Due to the rural nature of the District and the evidence of identified housing need in rural communities it is considered necessary to have a rural exceptions policy. The decision to have a policy means there are a number of ways that it can be strengthened, for example, defining the basic range of services appropriate. By strengthening the policy it can be demonstrated that consultation responses have been taken into account.

### Changes made

The policy has been strengthened to apply specifically to Key Service Centres and Smaller Settlements, removing the 3,000 population threshold. The criteria for eligible people have been expanded to include those in adjacent settlements in recognition of the need to provide affordable housing for people living in very small settlements without a basic range of services.

## Tests of Soundness

.88 There are no particular concerns with compliance with the Tests of Soundness.

.89 Go East expressed concern that the policy is not locally specific. It was recommended that a paragraph explaining that the Council intends to rely on national policy, PPS3, para 30, would suffice.

## Approach taken

.90 The approach taken is detailed in Volume 1 on page **x**.

## Gypsies, Travellers and Travelling Showpeople

Table 8 Key Sources for Gypsies, Travellers and Travelling Showpeople

National	PPS3: Housing Circular 01/06 Planning for Gypsy and Traveller Caravan Sites Circular 04/07 Planning for Travelling Showpeople SS25 Housing Act 2004
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Regional	East of England Plan Gypsy and Traveller Accommodation Assessment (2006) (Sub Regional), RSS Single Issue Review - Planning for Gypsy and Traveller Accommodation in the East of England (Issues and Options) (May 2007). Draft Policy (February 2008). Cambridge Sub Region Strategic Market Housing Assessment (2008)
Local	Housing Land Availability Study (2007) updated and adapted to form Strategic Housing Land Availability Assessment (SHLAA), (2008) Saved Local Plan 1995 policy H44

## Issues and Options

### Issues and Options Identified for Consultation

Issue 20: The need to ensure identified accommodation needs of gypsies, travellers and travelling showpeople are adequately met.

Option 22: Policies will set out criteria to ensure sites are provided which meet the identified accommodation needs of gypsies, travellers and travelling showpeople.

Question 23: Do you think a criteria based approach will adequately meet the identified accommodation needs of gypsies, travellers and travelling showpeople? (Please give reasons)

Question 24: What criteria would you like to see included in this policy?

**.91** This issue was originally raised as part of the Development Control Policies DPD. However, due to changing national policy it has been moved to the Core Strategy.

### Reasonable Alternatives

**.92** None. The provision of sites to meet identified accommodation needs of gypsies, travellers and travelling showpeople is a requirement of national and strategic guidance. The above option represents the most appropriate means to meet the identified accommodation needs of this group. The need for allocations will be considered in the context of preparing a separate DPD.

### Summary of Initial Sustainability Appraisal of Issues and Options

**.93** The option was considered sustainable.

### Consultation Responses

**.94** Responses were supportive of a criteria based approach based on sustainability issues.

### Further Options Consultation

#### Towards a Spatial Strategy

The Option put forward was:

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The Core Strategy policy will have to take account of the need to ensure that Gypsies and Travellers are accommodated in sustainable locations where essential services such as water and sewerage are provided and with good access by foot, cycle or public transport to services such as education and health. It will also need to take account of the rural nature of Huntingdonshire where the availability of public transport is limited. Providing sites in appropriate locations will also help prevent the social exclusion of Gypsies and Travellers. At the same time it will need to take into account that Gypsies and Travellers often prefer a rural location with a degree of separation from the settled community.

The criteria will also need to guide the provision of sites into areas where the health and safety of occupants are not put at risk. This will mean, for example avoiding areas close to trunk roads where access may be unsafe, air quality is poor and there is unacceptable noise constraint. Similarly there should not be an unacceptable flood risk.

However, it will be important to ensure that the criteria include protection for the environment, so that sites do not harm other interests such as the character of the landscape and wildlife, nor have an unacceptable adverse impact on the settled community.

## Summary of Initial Sustainability Appraisal of Towards a Spatial Strategy

**.95** The option is positive in promoting the needs of the gypsy and traveller community.

### Key Stakeholders' Responses

**.96** Respondents acknowledged the current government priority on ensuring adequate provision is made for the gypsy and traveller communities. Responses were positive stressing the importance of convenient access to services, such as health care, to reduce inequalities, but seeking a balance with protecting the interests of local residents.

### Assessment of Responses and Alternative Approaches

**.97** The Preferred Approach takes forward the option presented in the 'Towards a Spatial Strategy' document with minor amendments as suggested by respondents.

## Core Strategy Preferred Options

### Policy Wording put forward for participation on Preferred Options

Account will be taken of the need to ensure that Gypsies, Travellers and Travelling Showpeople are accommodated in sustainable locations where essential services such as water and sewerage are provided and with good access by foot, cycle or public transport to services such as education and health. Account will also be taken of the rural nature of Huntingdonshire where the availability of public transport is limited. Providing sites in appropriate locations will help prevent the social exclusion of Gypsies, Travellers and Travelling Showpeople and conflict with settled communities. Consideration will be taken of the preference of many Gypsies, Travellers and Travelling Showpeople for a rural location with a degree of separation from the settled community.

The following criteria will guide the provision of sites:

adequate schools, shops and other community facilities are within reasonable travelling distance, and can be reached by foot, cycle or public transport;

the site is served (or can be served) by adequate water and sewerage connections;

there would be no significant adverse effect on the amenity of nearby residents or operations of adjoining land uses;

the health and safety of occupants are not put at risk including through unsafe access to sites, poor air quality or unacceptable flood risk.

## Reasonable Alternatives

**.98** The need for a policy on Gypsies, Travellers and Travelling Showpeople is set out in national guidance, therefore not including a policy is not a reasonable alternative. The consultation responses indicated that the policy could be more locationally specific as it currently is focused on amenity issues. The reasonable alternative assessed below is the need to strengthen the policy and the inclusion of additional criteria.

## Summary of draft Final Sustainability Appraisal

**.99** The approach is sustainable and consistent with government guidance. Although no reference to the provision of waste or recycling is made within the policy wording, this is considered to be too specific for a strategic policy. Due to the relatively small number of pitches the District needs to accommodate many effects are assumed to be neutral. This approach meets a significant proportion of the social objectives, for example, reducing inequalities. Further guidance will be provided in the forthcoming Gypsy & Traveller Sites DPD.

## Consultation Responses

**.100** Responses to this policy were fairly mixed with 6 out of 11 respondents clearly objecting to it. A number of responses did not give a clear indication of whether they supported or objected to it. A number of the objectors highlighted that the policy as worded is not locationally specific and is geared more towards the amenity impact of sites. It was suggested that additional criteria need to be included, for example, the location of site relative to settlement position in the settlement hierarchy and the range of services available. Furthermore, one respondent suggested that another criteria relating to the impact on the form of character is required. It was also noted by one respondent that the supporting text makes reference to circular 01/2006 which has been updated by 04/2007.

## Assessment of Responses and Alternative Approaches

Consultation responses clearly indicated that the preferred policy is not locationally specific. A number of respondents suggested the inclusion of additional criteria to strengthen the policy relating to settlement position in the hierarchy and services available. As previously mentioned, not having a policy on Gypsies, Travellers and Travelling Showpeople in the Core Strategy is not a reasonable alternative as it is required by national guidance. It had previously been included in the Issues and Options Development Control Policies

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DPD until consultation responses highlighted that this was not in accordance with national guidance. The alternative approach taken up through the changes made as shown below is to strengthen the policy by addition of more detailed criteria.

## Changes made

The policy has been supplemented to require pitch provision to be appropriate to settlement position in the settlement hierarchy and services available. This was included in response to concern that the policy was not taking into account the settlement hierarchy. Additional criteria have been included which protect the landscape character of settlements and ensure adequate provision of boundary treatment. Criteria covering the need for adequate vehicular access and turning circles is also included. The final criteria has been strengthened to reflect concern that the health and wellbeing of the gypsy and traveller community were not adequately being protected. The policy now protects the gypsy and traveller community against unacceptable noise or flood risk in line with that offered for the settled community. Reference to Circular 04/07 has been added.

## Tests of Soundness

**.101** In selection of the Preferred Approach the Council has been concerned with ensuring consistency, as far as it is possible to do so, with the single issue review of the Regional Spatial Strategy on planning for Gypsies and Traveller accommodation. The Council is satisfied that at this strategic level there are no problems with conformity. The Council has committed to producing a DPD for this policy area which will provide the opportunity for greater detail in order to mete the regional policy to provide certain numbers of pitches.

**.102** Go East recommended that the submission Core Strategy includes reference to the most up-to-date government guidance and suggested that the Council make reference to circular 04/07 and that additional criteria is included relating to settlement position in the settlement hierarchy and services available.

## Approach taken

**.103** The approach taken is detailed in Volume 1 on page **x**.

## Employment

**Table 9 Key Sources for Employment Growth**

National	PPS1: Delivering Sustainable Development PPS1 Supplement: Planning and Climate Change PPG 4: Industrial, commercial development and small firms Consultation paper on PPS4 Planning for Sustainable Economic Development PPS7: Sustainable Development in Rural Areas Employment Land Review Guidance Note PPS25: Development and Flood Risk Flood Risk: A Practice Guide Companion to PPS25 A 'Living Draft' consultation paper
Regional	East of England Plan

Local	The Employment Land Review (2007) Housing Land Availability Study (2007) updated and adapted to form Strategic Housing Land Availability Assessment (SHLAA) (2008)
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## Core Strategy Issues and Options

### Issues and Options Identified for Consultation

#### Overall scale

There are a number of ways in which the overall scale of employment land need can be calculated. One approach is to project recent trends - in effect as 'business as usual' approach. The most significant alternative is to take into account the impact of changing economic, social and environmental conditions and try to help develop a 'low carbon future'. The following options allow for a 15 year supply of employment land from the anticipated adoption date of the DPD (2009).

Option 17: The Core Strategy could plan for a net requirement of 110 ha. This is based on a projection of development trends over the five years from 2002. It assumes continued relatively high rates of economic growth, no constraints on the availability of labour and no concessions to climate change.

Option 18: The Core Strategy could plan for a net requirement of 80 ha. This lower figure reflects the constraints to growth that could arise from the limited availability of local labour to work in additional businesses. It also reflects higher priority being given to reducing our impact on climate change by concentrating large scale warehouses at multi-modal locations and the replacement of buildings which are energy inefficient with new zero carbon buildings.

Question 21: Which of these of options would you prefer and why?

Question 22: Are there any other options which should be considered?

#### Overall distribution

There are many ways that the additional employment land could be distributed across the District. We need to consider how much of the total should be located to follow population growth and how much should be located in accordance with market demand for locations in the Huntingdon area, the St Neots area and St Ives as opposed to other areas where a number of allocations remain undeveloped.

Option 19: Development could be distributed in locations to follow population growth.

Option 20: Development could follow the market preference for location in the Huntingdon area, the St Neots area and to a lesser extent St Ives.

Question 23: Which of these options would you prefer and why?

Question 24: Are there any other options which you think we should consider?

Question 25: To achieve your chosen option which of the directions of growth shown would you rather see developed?

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## Reasonable Alternatives

.104 The alternatives were put forward within the options and questions raised.

## Summary of Initial Sustainability Appraisal of Issues and Options

.105 Overall scale: option 18 was favoured over option 17 as it made a more positive contribution to the achievement of the SA objectives. Option 18 takes into account climate change and the need to replace old building stock with zero carbon development. As it has a lower land requirement it also takes into consideration constraints on the availability of labour and places less pressure on undeveloped land.

.106 Overall distribution: no in-depth appraisal of option 19 was made as it was considered difficult to complete this process without determining the distribution of population growth. It was suggested that limiting development to the market preference of Huntingdon, St Neots and a limited extent to St Ives would potentially result in population growth without employment growth and may result in an increased need to travel. However, due to the sustainability of all three settlements in terms of services and facilities provided and their accessibility, it was considered that the impact may be limited.

## Consultation Responses to Issues and Options

.107 There was confusion expressed between the two options based on the draft Employment Land Review. Many respondents thought that in order to redress the balance between jobs and homes and tackle out-commuting it would be necessary to provide a high level of employment land and so expressed a preference for the business as usual option. It has been argued that with a high level of people travelling outside the District for work that we are currently in a high carbon scenario and the best way to reduce this level would be to address the high numbers of out commuters by facilitating a broad range of employment sites providing jobs suitable for people who currently travel out of the District to work.

## Further Options Consultation

### **Towards a Spatial Strategy**

All options in Towards a Spatial Strategy proposed a figure of 110ha based on calculations from the draft Employment Land Review. This assumed continued relatively high rates of economic growth, no constraints on the availability of labour and no concessions to climate change.

#### *Cambridge Sub-region Focused Growth*

An equal distribution of 50ha each was ascribed to the Huntingdon area and St Neots area, a further 8ha to St Ives and 2ha to Ramsey and Bury.

#### *Huntingdon Area Focused Growth*

In line with the extra housing growth proposed for the Huntingdon area in this option 65ha of employment land was proposed. 40ha were proposed in the St Neots area with 3 ha in St Ives and 2ha in Ramsey and Bury.

#### *St Neots Area Focused Growth*

In line with the extra housing growth proposed for the St Neots area in this option 65ha of employment land was proposed. 40ha were proposed in the Huntingdon area with 3ha in St Ives and 2ha in Ramsey and Bury.

## *Dispersed Growth*

This option proposed a more dispersed distribution of employment in line with the more dispersed housing distribution proposed. An equal distribution of 46ha each was ascribed to the Huntingdon area and St Neots area, a further 8ha to St Ives and 10 ha to Ramsey and Bury.

### **Summary of Initial Sustainability Appraisal for Towards a Spatial Strategy**

**.108** The Cambridge Sub-Region focus and Huntingdon area focus both propose a high proportion of employment land in accessible locations with high market demand. These options propose a significant proportion of growth for Huntingdon which has demand and capacity to accommodate additional employment development. Although St Neots has a relatively strong market for employment, it is not as buoyant as Huntingdon and presents different challenges. However, it will be important to provide appropriate employment opportunities in the St Neots option to help limit out commuting. Provision of employment for Ramsey and Bury in the dispersed option may help to regenerate the town and promote opportunities to contribute to the rural economy.

### **Key Stakeholders' Responses**

**.109** Stakeholders considered the options as a package of housing, employment and retail growth with responses typically considering the implications of growth as a whole rather than the individual elements.

**.110** The Cambridge sub-region focused growth option gained qualified support from 5 out of 17 respondents who thought it offered the most balanced option and would maximise the use of existing infrastructure and services. The main concerns expressed over this option regarding employment were the likelihood of employment proposals to the east of St Ives impacting on the functional floodplain.

**.111** The Huntingdon area focused growth option received qualified support from 8 out of 21 respondents. They considered it to offer a central location in the District with good and improving communication links and to provide the best response to market preferences for employment growth. Opposition was expressed to the extension of employment land to the north of Huntingdon and its potential impact on the Stukeleys.

**.112** The St Neots area focused growth option received qualified support from 7 out of 18 respondents who thought it was most likely to deliver a sustainable new neighbourhood with good local services, employment and infrastructure. Some respondents thought it offered the best response to the need for more employment opportunities in St Neots.

**.113** The dispersed growth option received qualified support from 7 out of 19 respondents who generally believed it would reduce the impact of development on any one existing settlement. The main concerns expressed were that the shortage of rural employment opportunities would result in this option giving rise to greater dependency on car transport and that there are insufficient local rural employment opportunities to justify dispersed housing growth.

### **Assessment of Responses and Alternative Approaches**

**.114** The main Issues and Options consultation document suggested two alternatives: planning for either 110ha or 80 ha of employment land. The higher figure is a 'business as usual' approach; the lower figure took into account the impact of changing economic, social and environmental conditions and sought to help develop a 'low carbon future'. Both of these have been superseded by further refinement to the Employment

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Land Review which has given rise to a further alternative seeking 82ha of employment land. This looks to reflect the desire for a low carbon future with the need to target the stimulation of employment growth and address out-commuting in St Neots.

**.115** Responses mainly favoured concentrating employment growth in Huntingdon and St Neots with widespread recognition of the key role each plays in the local economy. Huntingdon was considered to potentially be slightly more appealing to the market than St Neots but a number of respondents supported the boost that the combination of housing, employment and retail growth could give to St Neots. Significant concerns were expressed about the other two options put forward in Towards a Spatial Strategy. The Cambridge sub-region focus gave rise to concerns over employment growth to the east of St Ives and the impact on the floodplain if this option was pursued. Further discussions with the Environment Agency have raised issues over the feasibility of providing adequate flood mitigation to deliver a strategic scale of growth in this location. The dispersed growth option gave rise to significant concerns over increasing dependency on car transport and although some rural employment may be delivered through this approach it is likely to generate increased commuter traffic.

## Core Strategy Preferred Options

### Policy Wording put forward for participation on Preferred Options

At least 82ha of employment land will be provided before 2026 in order to support the creation of at least 13,000 jobs and reduce the significant level of out commuting. Of this at least 15ha will be on previously developed land. Provision will be monitored regularly and the release of locations will be managed and phased during the plan period with the aims of meeting identified needs and demand and maintaining sufficient supply of deliverable sites.

As part of the overall development strategy to concentrate the majority of growth in the Huntingdon and St Neots Spatial Planning Areas, strategic employment growth will be located:

In the Huntingdon Spatial Planning Area where 51ha of land will be provided, of which at least 13ha will be on previously developed land. Provision will be made in the following locations:

In a mixed use redevelopment for B1 uses to the west of the town centre covered by the Huntingdon West Area Action Plan, and in greenfield development for B1, B2 and B8 uses to the north west of the town.

In a mixed use redevelopment for B1 uses on land within Brampton; and

In Godmanchester as part of significant mixed use greenfield development to the south east/east of Godmanchester after the A14 road improvements have been implemented.

In the St Neots Spatial Planning Area where 25ha of land, all of which is greenfield land, will be provided in the following location:

In a significant mixed use urban extension for B1, B2 and B8 uses on greenfield land to the east of St Neots.

In the St Ives Spatial Planning Area;



On existing commitments and other sites within the built up area of St Ives, which might come forward during the plan period.

In the Ramsey Spatial Planning Area where at least 4ha of land, of which at least 2ha will be on previously developed land, will be provided in the following locations:

In a mixed use redevelopment for B1 and B2 uses to the west and to the north of Ramsey.

Outside of the Spatial Planning Areas, in the Key service Centre of Yaxley, 2ha of land will be provided for B1, B2 and B8 uses to the north east of the village.

## Reasonable Alternatives

**.116** Consultation responses indicated that respondents were not supportive of the overall amount of employment land to be planned. It was apparent that the majority of respondents felt a higher proportion of employment land should be planned for. The reasonable alternatives raised from the consultation process are no different from those put forward at Issues and Options; plan for a higher target or plan for a lower target. Alternatives to the broad locations set out could be offered as suggested by a number of respondents promoting specific sites.

## Summary of Highway Impacts Assessment

**.117** Atkins were commissioned to undertake an assessment of the potential highway impact of the four options put forward in Towards and Spatial Strategy and the Preferred Option. The detailed report is submitted as part of the evidence base (Atkins - Huntingdonshire Spatial Strategy Options Assessment, 2008). For an overall summary relating to the four options considered in Towards a Spatial Strategy and the Preferred Option please refer to the Strategic Housing Growth section. Some elements of the Assessment were of particular relevance to employment and commuting trips.

**.118** Based on 2001 Census data 52.6% of Huntingdon's residents live and work within the town, closely followed by 47.3% of St Neots' residents living and working there. St Ives and Ramsey demonstrate higher levels of out-commuting at 33.8% and 35.5% internalisation levels respectively. For Options A and B the proportion of housing provision is relatively high compared to the employment provision in Huntingdon which could see an increase in workforce internalisation. In most of the proposed growth options the housing provision for St Neots is relatively large compared to the employment provision and an increase in out-commuting may result. The Assessment suggests that although the demand for housing may increase due to significant increase in the elderly population, the demand for jobs is likely to remain at the current level. If this is the case, the employment provision within Huntingdonshire is likely to result in an increase in internalisation and the impact of the proposed growth options on the highway network should reduce.

## Summary of Draft Final Sustainability Appraisal

**.119** All spatial planning areas for employment development are considered sustainable with the majority of the SA Objectives being met in a positive way. Employment growth is directed towards the most sustainable locations, with all available brownfield land used and, where greenfield development is necessary, it is achieved in the most sustainable locations in the District. All spatial planning areas have potential uncertain effects on biodiversity and green infrastructure. Any form of development will have an impact on biodiversity – even in brownfield locations which are known to potentially sustain a high level of biodiversity. It will be important to ensure that any potential negative impacts are minimised and mitigated. However, development will also provide opportunities to enhance biodiversity through, for example, design and landscaping. Similarly, the provision of cycle routes, footpaths and

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bridleways is an important part of Green infrastructure and provides ways to mitigate against habitat fragmentation. Providing local employment opportunities throughout the District will be important to help reduce levels of out commuting and will also be beneficial for the District's economy in terms of its viability and vitality.

## Consultation Responses

**.120** The vast majority of respondents objected to the proposed policy. Approximately 80% of respondents clearly opposed the proposed policy with a significant number of objectors suggesting the amount of employment land planned for is insufficient to meet the requirements of the RSS, RES and limit out-commuting which is a significant problem for the District. A significant number of respondents considered that the balance of employment provision between St Neots and Huntingdon is inappropriate and that more consideration should be given to supporting the redevelopment of existing poorly performing employment areas, particularly in St Neots. The reliance on strategic public transport improvements around St Neots that have yet to be finalised was raised as being inappropriate and contrary to PPG13 and PPS1 Supplement on Planning and Climate Change. Employment development north west of Huntingdon was thought to be potentially detrimental to the landscape by a few.

**.121** Concern was also raised about the level of growth proposed for Key Service Centres. A number of respondents suggested that the policy was overly focused on urban areas and failed to encourage small scale employment development in Key Service Centres which is important to protect their vitality and viability. Respondents suggested that no explanation had been given as to how the proposed locations for employment development had been identified and that more consideration for potential environmental impacts was needed. It was also noted that the requirements of PPS1 Climate Change and draft PPS4 Planning for Sustainable Economic Development had not been considered. One respondent suggested that the consultation on the Employment Land Review was inadequate as it only involved landowners and did not go out to Parish or Town Councils or the public.

**.122** The policy also generated a number of comments which specifically related to individual sites. A number of respondents proposed or promoted specific sites for employment, particularly in relation to St Ives as respondents considered that the settlement needed more employment provision in order to improve its workforce to jobs ratio. It was also noted that there is inconsistency between policy 2 (strategic housing growth) and this policy with regards to Little Paxton as the settlement should be identified as an area for employment development. There were mixed responses to proposed employment provision as part of mixed use development south east of Godmanchester. It was suggested that more clarity was needed within the policy about employment types and levels for this area.

### Assessment of Responses and Alternative Approaches

The vast majority of respondents felt that 82ha of employment land for the entire District was inadequate to meet the requirements of the RSS and RES but none provided justification for an alternative figure. It should also be noted that much employment growth will be in other sectors, not just those occupying B1, B2 and B8 type premises dealt with in this policy.

The objectives put forward in the Core Strategy clearly set out the Council's aspirations to promote enhanced sustainability within the District, to make the best use of land and to reduce the effects of climate. In conjunction with national policies to tackle climate change it is considered reasonable to aspire towards the Low Carbon Future approach for employment whilst acknowledging that changes to employment premises and ways of working will take time. In the medium term the approach would require less land to deliver the same number of jobs as at present as the buildings and their surrounding land would be used more efficiently. The detailed policies steering how this will be achieved will be set out in the Development Control Policies DPD.

It was suggested by a number of respondents that there had not been sufficient explanation given as to how the sites had been identified. A large number of sites were identified through the Issues and Options consultation following requests to landowners, agents and developers for information on aspirations for sites that might have potential for development. These were then considered as packages of sites that might make particular broad locations of growth realistic to deliver.

A number of respondents indicated concern over the balance of employment land distributed between St Neots and Huntingdon and that more employment land should be proposed for St Ives, Ramsey and Bury and key service centres to support the rural economy. The locations identified reflect the main market preference and have been informed by the Employment Land Review. This was an extensive study carried out to identify potential new sites which stakeholders were invited to submit. They were assessed against a set of criteria focusing on issues such as accessibility and sustainability. It is considered that the locations proposed represent the most sustainable opportunities for employment development and reflect current market conditions. Additional land has been proposed in St Neots to that suggested by the Employment Land Review in order to promote a more balanced mix of uses in the strategic growth area identified to the east of the town. The Core Strategy only identifies strategic levels of growth; it is the role of the Planning Proposals DPD to put forward specific sites and the need for non-strategic employment allocations in Key Service Centres will be considered when this document is prepared. Implementation of the policy will be carefully monitored to ensure that supply meets demand and, if necessary, further sites brought forward.

## Changes made

The total land area allowed for in the policy is increased to 85ha. Ramsey is increased to 9ha to acknowledge the mixed use development proposals to the north west of the town which have not yet a formal planning permission. For consistency 2ha of land specified to the north east of Yaxley is removed as it is an existing commitment not a new proposal. Existing commitments in Little Paxton, Sawtry and Yaxley are acknowledged. The reasoned justification is supplemented with further reference to the Council's Economic Strategy and the Employment Land Review.

## Tests of Soundness

- .123 There are no particular concerns with compliance with the Tests of Soundness.
- .124 Go East did not make specific comments for this policy.

## Approach taken

- .125 The approach taken is detailed in Volume 1 on page **x**.

## Retail

**Table 10 Key Sources for Planning for Retail**

National	PPS1: Delivering Sustainable Development PPS1 Supplement: Planning and Climate Change PPS6: Planning for Town Centres
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	PPG13: Transport
Regional	East of England Plan
Local	Huntingdonshire Retail Assessment Study (2005) and Update (2007)

## Core Strategy Issues and Options

### Issues and Options identified for Consultation

#### Overall scale

The Retail Assessment Study Update (2007) suggested that the Core Strategy should endeavour to increase the proportion of available expenditure which is spent locally. One way of encouraging this is to provide a greater quantity and choice of shops for people to use which has the added benefit of reducing the need to travel further afield for certain purchases. A target is suggested of 20,000m<sup>2</sup> net of additional comparison retail floorspace and a further 3,900m<sup>2</sup> net of convenience floorspace in the District for the period 2006-2021. This is based on the aspiration of a slow, steady increase in the proportion of expenditure being retained locally.

Option 21: The Core Strategy could plan for a target of 20,000m<sup>2</sup> net additional comparison retail floorspace and 3,900m<sup>2</sup> net additional convenience floorspace.

Option 22: The Core Strategy could plan for a higher target.

Option 23: The Core Strategy could plan for a lower target.

Question 26: Which of these options do you prefer and why?

Question 27: If you prefer a lower or higher target what should it be and why?

#### Overall distribution

A target of 20,000m<sup>2</sup> net additional comparison floorspace is suggested above. The Retail Assessment Study identified comparatively strong demand from retailers wishing to open in Huntingdon and an encouraging level of interest in St Neots which has traditionally been considered less attractive by investors. The distribution given in the option below was suggested by the Retail Assessment Study. Government guidance dictates that new retail facilities should be in town centres and edge of centre and out of centre locations only considered where this cannot be reasonably achieved. The Retail Assessment Study suggested that although the level of quantitative need for convenience floorspace appears low there may be opportunities for provision based on qualitative grounds in order to increase the range of facilities available. In particular it noted the need for a discount foodstore in Huntingdon town centre. Compared with other centres Huntingdon is the higher order centre where pressure for further retail development is greatest. It also has more opportunities to regenerate and thus strengthen the range of uses on the back of retail expansion with sites in the town centre and sites beyond the town centre.

Option 24: Development could follow the market preference resulting in around 12,000m<sup>2</sup> net of comparison retail growth in Huntingdon, around 6,000m<sup>2</sup> net in St Neots and 2,000m<sup>2</sup> net in other settlements.

Option 25: Development could be distributed equally between St Neots and Huntingdon and a lesser amount allowed in St Ives and Ramsey

Question 28: Which of these options would you prefer and why?

Question 29: Are there any other options which you think we should consider?

## Reasonable Alternatives

**.126** The alternatives were put forward within the options and questions.

## Summary of Initial Sustainability Appraisal on Issues and Options

Overall scale:

**.127** Option 21: is based on the floorspace targets in the Retail Assessment Study. It assumes that development would be focused in the town centres and reduces pressure on undeveloped land. It would also allow for a slow, steady increase for the proportion of expenditure being retained locally. The targets in the Retail Assessment Study reflect demand in the District and are tailored to meet local need.

**.128** Proposing higher targets (option 22) would increase the range of facilities available and help the market towns compete against higher order centres. However, the benefits of this option would be limited to availability of sites within town centres and the targets suggested in the Retail Assessment have taken into account retail interests in the District therefore there may not be the demand for higher targets.

**.129** Using a lower target, as proposed in option 23, may not sustain the vitality and viability of market towns to adequately compete with higher order centres such as Bedford.

Overall distribution:

**.130** Option 24: by following market preference retail development would be directed towards Huntingdon - the principal centre in the District - where pressure for retail development is greatest. This would increase Huntingdon's competitiveness with other higher order centres outside of the District thereby increasing the town's vitality and viability. Option 25 proposes an equal distribution of retail growth between St Neots, Huntingdon and St Ives. Although a broader distribution would potentially increase accessibility for a wider range of people, the markets in St Neots and St Ives are not as strong as Huntingdon. In St Neots and St Ives there are limited brownfield sites within the town centres and greater development pressure would be placed on greenfield land.

## Consultation Responses to Issues and Options

**.131** There was general support for the provision of 20,000m<sup>2</sup> of retail floorspace in accordance with the recommendations of the Retail Study to help Huntingdonshire's town centres compete with other surrounding towns. Some consultation responses questioned the bias towards Huntingdon in the Retail Study and considered that St Neots should have higher figures but others recognised the greater likelihood of delivery of retail development in Huntingdon due to market preference and potential availability of sites. There was some concern that the targets would not be achievable although most people were supportive of trying to keep local spending in the local area. An alternative was put forward of a large scale district centre on land adjacent to current residential development to the east of St Neots.

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## Further Options Consultation

### Towards a Spatial Strategy

All options in Towards a Spatial Strategy proposed a figure of 20,000 sq m of comparison retail floorspace provision based on the recommendations of the Huntingdonshire Retail Study. The figure recommended for convenience retail floorspace was considered to be too low to justify identification of strategic directions of growth.

#### *Cambridge Sub-region Focused Growth*

Reflecting market demand 12,000m<sup>2</sup> of floorspace was ascribed to the Huntingdon area and 6,000m<sup>2</sup> to the St Neots area with a further 2,000m<sup>2</sup> to St Ives.

#### *Huntingdon Area Focused Growth*

Reflecting market demand 12,000m<sup>2</sup> of floorspace was ascribed to the Huntingdon area and 6,000m<sup>2</sup> to the St Neots area with a further 2,000m<sup>2</sup> to St Ives.

#### *St Neots Area Focused Growth*

To balance market demand with recognition of the level of housing growth proposed in the St Neots area this option proposed 9,000m<sup>2</sup> floorspace in each of the St Neots area and the Huntingdon area. Again 2,000m<sup>2</sup> was proposed in St Ives.

*Dispersed Growth* This option again looked to market demand for a lead in distribution of retail floorspace proposing 12,000m<sup>2</sup> in the Huntingdon area, 6,000m<sup>2</sup> in the St Neots area then proposing 1,000m<sup>2</sup> in each of St Ives and Ramsey and Bury.

## Summary of Initial Sustainability Appraisal of Towards a Spatial Strategy

**.132** All options recognise the strong position of Huntingdon as the principal centre in the District and direct significant proportions of retail development towards the town centre. Huntingdon has a strong market demand and spare capacity as identified in the Retail Assessment Study and further growth would enhance its competitiveness against other higher order centres outside the District. The St Neots Area focused growth proposes less retail development for Huntingdon and more for St Neots. Although the market is strong in St Neots, it is not as strong compared to Huntingdon and presents different challenges. There are also limited brownfield sites within the town centre and growth would be directed towards greenfield land. The creation of a retail area outside of the existing town centre would need to be complementary and not jeopardise existing retail provision in St Neots.

### Key Stakeholders' Responses

**.133** Stakeholders considered the options as a package of housing, employment and retail growth with responses typically considering the implications of growth as a whole rather than the individual elements.

**.134** The Cambridge sub-region focused growth option gained qualified support from 5 out of 17 respondents who thought it offered the most balanced option and would maximise the use of existing infrastructure and services. Supporters considered that existing retail centres could cope with expansion.

**.135** The Huntingdon area focused growth option received qualified support from 8 out of 21 respondents. They considered it to offer a central location in the District with good and improving communication links and to best respond to market preferences for employment and retail growth. The option was felt to strengthen Huntingdon's position as the principal retail centre in the District but the limited growth elsewhere would help to maintain other centres' vitality and viability.

**.136** The St Neots area focused growth option received qualified support from 7 out of 18 respondents who thought it was most likely to deliver a sustainable new neighbourhood with good local services, employment and infrastructure. The limited scope for additional development in St Neots town centre was a major point of concern to respondents. The suggestion was put forward of incorporating a new retail centre within developments to the east of St Neots.

**.137** The Dispersed growth option received qualified support from 7 out of 19 respondents who generally believed it would reduce the impact of development on any one existing settlement. Local support considered it would help retain the retail base in Ramsey. Concern was also expressed that none of the options gave sufficient support to smaller settlements and sustaining village services.

## Assessment of Responses and Alternative Approaches

Respondents were broadly satisfied with the future level of retail growth suggested for the District as a whole accepting that it was a balance between trying to enhance the proportion of local spending retained in the market towns and recognition of their location between three higher order competing centres. There was broad recognition of Huntingdon's role as the principal retail centre in the District but some desire to try to redress the balance by boosting the retail economy in St Neots.

An alternative was suggested through the consultation responses of a large scale district centre on land adjacent to current residential development to the east of St Neots. This has been incorporated into the preferred option for growth which puts forward a major new neighbourhood to the east of St Neots which would incorporate a mixture of uses, including an appropriate scale of retail development to promote its sustainability, although not necessarily on the specific site put forward nor at the scale envisaged.

## Core Strategy Preferred Options

### Policy wording put forward for participation on preferred options

At least 20,000m<sup>2</sup> of comparison floorspace and 4,000m<sup>2</sup> of convenience floorspace will be provided before 2026. As part of the overall development strategy to concentrate the majority of growth in the Huntingdon and St Neots Spatial Planning Areas, retail growth will be located:

In 9,000m<sup>2</sup> of comparison floorspace in Huntingdon, concentrated in the town centre and complementary and appropriate development in significant mixed use redevelopment in the area west of the town centre covered by the Huntingdon West Area Action Plan;

In 9,000m<sup>2</sup> of comparison floorspace in St Neots, concentrated in the town centre and complementary and appropriate development as part of significant mixed use urban extension on greenfield land to the east of the town;

In 2,000m<sup>2</sup> of comparison floorspace in St Ives concentrated in the town centre; and

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In 4,000m<sup>2</sup> of convenience floorspace located to serve population growth in town centres across the District.

## Reasonable Alternatives

**.138** Consultation responses indicated that insufficient evidence had been provided to support the need for additional retail development outside of existing town centres. This was reflected in a number of respondents questioning the level of retail development proposed for St Neots which does not reflect market demand and objecting to proposed development outside of existing centres in Huntingdon and St Neots. In response to comments received, the reasonable alternative identified is to strengthen the existing policy.

## Summary of draft Final Sustainability Appraisal

**.139** The policy is consistent with settlement and housing hierarchies established by other policies. It provides sustainable spatial priorities which direct the majority of retail development towards town centres which have strong market demand as identified in the Retail Assessment Study 2005 and Update 2007.

## Consultation Responses

**.140** Responses to this policy were fairly evenly split with 9 out of 21 respondents explicitly supporting it and 11 objecting to it. The main issues raised were the lack of evidence to support the policy, in particular the lack of proven need for an out of town retail centre in St Neots and a lack of regard for PPS 6 and its sequential tests. A number of respondents were concerned that the Council had failed to apply these tests adequately when considering possible locations for retail development arguing that development should be concentrated in Huntingdon, not St Neots. Other respondents were concerned that the proposed expansion of town centres away from existing centres would detrimentally affect current independent retailers and the character of towns. It was also suggested that there was no proper explanation of how the sites had been identified and no consideration for environmental impacts or the impacts on the historic environment. It was suggested that greater clarity was needed with regards to location and phasing of retail development in Huntingdon. The absence of provision for Ramsey also raised concern.

## Assessment of Responses and Alternative Approaches

The Council considers the Retail Assessment Study (2005) and update (2007) which informed the retail policy to be robust. The Study (2005) was carried out by external consultants and provided forecasts of convenience and comparison floorspace based on an assessment of market preference and existing town centres. The update (2007) used more up-to-date technical data to provide improved forecasting. It also takes into account more detailed information in relation to phase II of the Chequers Court development being completed in Huntingdon.

With regard to Ramsey, comparison goods retail growth is unlikely to be successfully promoted at a strategic scale due to competition from Hampton and Peterborough. The existing convenience floorspace commitment was taken into account when the suggested target of 3,900 m<sup>2</sup> was calculated.



It is however, recognised that insufficient explanation as to how the sites have been identified has been provided and that more detailed reference needs to be made to the evidence base underpinning the policy. The Council has therefore strengthened the reasoned justification.

### Changes made

No changes have been made to the preferred option for the policy but the reasoned justification has been significantly enhanced to explain the role of different settlements in the retail hierarchy and the aspiration to retain more retail expenditure locally.

### Tests of Soundness

- .141 There are no particular concerns with compliance with the Tests of Soundness.
- .142 Go East did not make specific comments for this policy.

### Approach taken

- .143 The approach taken is detailed in Volume 1 on page **x**.

## Areas of Strategic Greenspace Enhancement

**Table 11 Key Sources for Areas of Strategic Greenspace Enhancement**

National	Natural Environment and Rural Communities Act 2006 PPS7: Sustainable Development in Rural Areas PPS9: Biodiversity and Geological Conservation Planning for Biodiversity and Geological Conservation a Good Practice Guide
Regional	East of England Plan Green Infrastructure Strategy for the Cambridge Sub-Region (2006) Cambridgeshire Biodiversity Action Plan (2004)
Local	Huntingdonshire Community Strategy (2004) Sustainable Community Strategy for Huntingdonshire (2008)  Great Fen project  Open Space, Sport and Recreation Needs Assessment and Audit (2006)

## Core Strategy Issues and Options

### Issues and Options identified for Consultation

Issue 7: The need to identify areas of 'Strategic Greenspace Enhancement' and to promote environmental, economic and social gains within these areas.

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Option 26: Policies will define areas of Strategic Greenspace Enhancement and identify green corridors connecting them and indicate how development proposals could contribute to improving their biodiversity, landscape and recreational value.

## Reasonable Alternatives

.144 None. The identification of areas for large-scale habitat enhancement is required by strategic guidance, while ensuring that development proposals contribute positively to its achievement is necessary if the objective is to be achieved.

## Summary of Sustainability Appraisal for the Issues and Options paper

.145 The option is clearly sustainable and has a positive impact on a number of the sustainability appraisal objectives, in particular those relating to open space, nature conservation and enhancement.

## Consultation Responses to Issues and Options

.146 The majority of respondents were supportive. Several respondents sought inclusion of reference to the Green Infrastructure Strategy and clarification of where the boundaries of Strategic Greenspace Enhancement areas would be defined. A small number were concerned that more detailed investigation of potential for habitat extensions should be conducted.

## Assessment of Responses and Alternative Approaches

.147 A map has been included in the preferred options document illustrating the areas of strategic green space enhancement and green corridors and reference made to the Strategic Green Infrastructure Strategy. It was considered appropriate to concentrate on the core areas and the corridors connecting them so that funding and enhancement work can be targeted to the areas where it will be most effective. As such the list proposed at Issues and Options has been reduced.

## Core Strategy Preferred Options

### Policy Wording put forward for participation on Preferred Options

Areas of Strategic Greenspace Enhancement along with green corridors connecting them are identified in Figure 8.1. Within these areas, coordinated action will be taken via consultation with statutory and other agencies to:

- safeguard potential sites of nature conservation value
- create new wildlife habitats
- contribute to diversification of the local economy and tourist development
- create appropriate access for a wide range of users to enjoy the countryside
- contribute where possible to enhanced flood protection

The creation or enhancement of green corridors connecting these areas will be promoted. It is particularly important that resources are concentrated in these areas in the early part of the plan period and to promote the early creation or enhancement of green corridors connecting these areas with areas of population, to form a coherent network:

The Great Fen Project;

The Grafham Water / Brampton Woodlands; and

The Great Ouse Valley (St Neots to Earith)

## Reasonable Alternatives

**.148** Consultation responses indicated that additional green corridors could be added and that the Council should taken into account green infrastructure initiatives outside of the District. These two reasonable alternatives are assessed below.

### Summary of draft Final Sustainability Appraisal

**.149** This policy approach is clearly sustainable and will work towards promoting areas of habitat creation as identified in the Biodiversity Partnership for Cambridgeshire and Peterborough's 50 year Wildlife Vision.

### Summary of Appropriate Assessment

**.150** This policy allows for the creation of large new areas of accessible green space in the vicinity of Huntingdon, Brampton and Godmanchester. In doing so, this could help to counteract any increased recreational pressure placed on Portholme SAC resulting from development in the Huntingdon Spatial Planning Area. The policy also identifies areas of green space creation around Ramsey (notably the Great Fen Project and associated green corridors) which could serve to reduce any recreational pressure on Orton Pit SAC arising from development proposed in the Ramsey Spatial Planning Area. However, the AA states that insufficient information is given on the timing of green space creation for it to definitively state that adverse effects on Portholme or Orton Pit would be unlikely.

## Consultation Responses

**.151** The comments in general were very supportive of this policy, with 16 out of 32 respondents explicitly stating support for the policy and a lot of others putting forward positive suggestions in order to improve and strengthen the policy. It was pointed out that no reference had been made to Green Infrastructure initiatives outside of the District such as the Nene Valley Strategy. One respondent suggested that another criteria related to tourism development and Greenspace Enhancement Areas needs to be added. A number of respondents identified additional green corridors that should be included on the map such as the South Cambridgeshire Woodlands and the River Nene. One respondent also suggested emphasising the connections between Cambourne and Cambridge.

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It was suggested that the reasoned justification needs to be strengthened by referencing the health benefits associated with greenspace, and the Open Space, Sport and Recreation Needs Assessment and Audit (2006) as well as the important role that green space plays in adapting to climate change.

## Assessment of Responses and Alternative Approaches

The responses were clearly supportive of the policy. Responses largely focused on how to improve the policy by adding wording and including reference to other green corridors and green infrastructure initiatives. The Council has taken these into account when revising the policy.

## Changes made

The policy has been restructured for greater clarity and the reasoned justification strengthened. The policy wording now clearly sets out areas of strategic green space enhancement and these are also identified on the strategic green infrastructure map. The criteria included in the policy which sets out action that will be taken within these areas have been enhanced with reference to ancient woodland, historic landscape and additional detail added for how tourist development and the local economy will be promoted. These additions have been included as a result of consultation responses. The connectivity of green corridors into the surrounding area is also acknowledged.

The reasoned justification includes a clear definition of what the Council means when using the term green infrastructure as some respondents indicated that a definition had not been provided. Throughout the reasoned justification the importance of green infrastructure in tackling climate change is emphasised as is the significance of areas of green infrastructure not identified in the policy wording or on the map. It also takes into account representations received on the lack of reference made to green infrastructure initiatives outside of the District.

## Tests of Soundness

.152 There are no particular concerns with compliance with the Tests of Soundness.

.153 Go East did not comment on this policy.

## Approach taken

.154 The approach taken is detailed in Volume 1 on page **x**.

## Infrastructure and Implementation

Table 12 Key Sources for Infrastructure Requirements

National	PPS3: Housing PPG13: Transport Circular 05/2005 - Planning Obligations Planning and Compensation Act 1991
Regional	East of England Plan

Local	Huntingdonshire Community Strategy (2004) Sustainable Community Strategy for Huntingdonshire (2008) Planning Contributions SPD (forthcoming) Developer Contributions Towards Affordable Housing SPD - November 2007 Huntingdonshire District Council Open Space, Sport and Recreation Needs Assessment and Audit (2006), Local Plan Alteration 2002 policies OB1 and OB2
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## Core Strategy Issues and Options

### Issues and Options identified for Consultation

Issue 12: The need to ensure appropriate, timely provision of any infrastructure requirements associated with new development.

Option 35: Policies will require development proposals to contribute towards the cost of providing infrastructure, and of meeting social and environmental requirements, where this is necessary to make a scheme acceptable in planning terms.

Criteria will be proposed to allow assessment of the scale and nature of development proposals where contributions are likely to be required.

Question 44: What criteria should be used to determine if contributions are necessary?

### Reasonable Alternatives

**.155** None. Existing national guidance (Circular 5/2005) requires development plans to set out policies indicating the circumstances in which planning obligations will be sought and indicates that formulae and standard charges may be used where appropriate.

### Summary of Initial Sustainability Appraisal for the Issues and Options paper

**.156** The approach is clearly sustainable and socially just ensuring that developers help to mitigate pressures placed on social, economic and physical infrastructure that arise from their proposals. It is also consistent with national guidance.

### Consultation Responses to Issues and Options

**.157** Most respondents considered this to be an important area of policy coverage, although there was only limited consensus on what should be included. General concerns were expressed regarding the importance of provision of services and facilities in conjunction with any new development. Several respondents sought provision of detailed criteria for infrastructure requirements in a Supplementary Planning document, with only one opposing

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this. The impact of requirements on viability was raised by several respondents with the suggestion that requirements be prioritised. The range of infrastructure issues to be addressed was considered too narrow by a few with suggestions of more emphasis on health, education, utilities and indoor sport and recreation.

## Assessment of Responses and Alternative Approaches

**.158** It was considered appropriate to include a list of areas that contributions are likely to be sought for. While it is not a comprehensive list it does cover the most likely areas, some additions have been made in drafting the preferred option to reflect concerns expressed by respondents. The Council is committed to producing SPD to support this policy area that will give more information.

## Core Strategy Preferred Options

### Policy Wording put forward for participation on Preferred Options

Development proposals will be expected to provide or contribute towards the cost of providing appropriate infrastructure, and of meeting social and environmental requirements, where these are necessary to make the development acceptable in planning terms.

Contributions may also be required to meet the management and maintenance of services and facilities provided through an obligation. The appropriate range and level of contributions will be assessed in a comprehensive manner, taking into account strategic infrastructure requirements and using standard charges where appropriate. Standards and formulae for calculating contributions will be set out in separate Supplementary Planning Documents. Where appropriate, the particular requirements of specific sites will be set out in other DPDs.

The nature and scale of any planning obligations sought for this purpose will be related to the form of development and its potential impact upon the surrounding area. Where appropriate, any such provision will be required to be provided on site. Where this is not possible, a commuted payment will be sought. The range and level of contributions will be assessed in a comprehensive manner, taking into account strategic infrastructure requirements and using standard charges or tariff where appropriate.

Contributions may be required for the following:

- affordable and key worker housing

- open space and recreation (including leisure and sports facilities)

- strategic green infrastructure

- transport (including footpaths, bridleways, cycleways, highways, public transport, car parks and travel planning)

- community facilities (including meeting halls, youth activities, library services, cultural facilities and places of worship)

- education, health and social care

- utilities infrastructure

emergency services  
environmental improvements  
drainage / flood prevention and protection  
waste recycling facilities  
public art

## Reasonable Alternatives

**.159** The consultation raised a number of issues which whilst not putting forward alternatives as such, identified potential omissions from the policy and the reasoned justification supporting it. The reasonable alternative identified by the Council is to strengthen the policy and the reasoned justification.

## Summary of draft Final Sustainability Appraisal

**.160** Although many of the effects of this policy are judged to be positive and it meets many of the social and environmental objectives however there are many variables involved in the implementation of this policy. Further guidance on this policy will be set out in a separate Planning Contributions SPD.

## Summary of Appropriate Assessment

**.161** Although policy 10 (infrastructure requirements) alludes to the need for development to contribute to utilities infrastructure, it is suggested that this needs to be expanded before it can be concluded that development under the Core Strategy is unlikely to lead to a significant effect on Fenland SAC (Woodwalton Fen), or the Ouse Washes.

## Consultation Responses

Responses to this policy were evenly split with 10 respondents expressing support and 18 out of 33 respondents explicitly opposing the policy. Other respondents did not explicitly state whether they objected or supported the policy but made a comment, for example, identifying where additional requirements will be needed. The main issues raised concerned the evidence base, particularly the need for a Water Cycle Strategy to provide a framework for planning and infrastructure provision. Further comments suggested that the policy needs to be far more detailed in order to provide certainty about what, how and when requirements and financial contributions will be sought. It was suggested that such detail cannot be adequately covered in a SPD alone and that this will have to build on a clear strategic policy. One respondent identified that development needs to take account of its impact on local communities and cited development in St Ives and the additional risk of flooding from surface water flooding as an example. Other respondents identified a need for community infrastructure to be included and improvements to the historic environment.

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It was clear that reference to open space and green infrastructure was supported by respondents with 3 representations citing these requirements as being particularly good. Other respondents simply registered their support in principle without specifying the area.

## Assessment of Responses and Alternative Approaches

The consultation process raised a number of issues, namely concern at an insufficient evidence base to underpin this policy and a lack of detailed criteria to provide certainty for developers. It was evident from consultation responses that the policy is necessary, therefore the reasonable alternative is focused on strengthening the existing policy and responding to the issues raised.

## Changes made

The supporting text has been significantly supplemented following receipt of initial research towards the Local Investment Framework. Policy development has also been informed by extensive consultation with bodies and agencies involved in delivering infrastructure. The limitations placed on the Council in setting out detailed requirements are explained. In response to a number of representations the text gives further information on the forthcoming Water Cycle Strategy for the District with specific detail on development and water supply challenges in St Neots.

The revised policy gives further information on why contributions are required, where they may be expected and how they will be assessed. Reference is made to the the intention to produce SPDs to provide a detailed framework for infrastructure delivery and to set out how calculations for contributions will be made.

## Tests of Soundness

**.162** There are no particular concerns with compliance with the Tests of Soundness.

**.163** Go East suggested that the policy does not provide enough detailed information on how contributions will be sought, when and by whom. It was suggested that these criteria are needed in order to provide developers with certainty over what contributions will be expected.

## Approach taken

**.164** The approach taken is detailed in Volume 1 on page x.



## Monitoring

### Core Strategy Issues and Options

.1 Monitoring aspects of the Core Strategy were not addressed in the Issues and Options consultation phase. Production of an Annual Monitoring Report is required under the Planning and Compulsory Purchase Act 2004 so proposing not to monitor the DPD is not a reasonable alternative. It was considered to be too early in the preparation of the DPD to propose monitoring methodologies or potential indicators until some firmer indication of the proposed content of the Core Strategy was known.

## Core Strategy Preferred Options

### Wording put forward for participation on Preferred Options

Table 13 Performance indicators and targets

Indicator	Indicator Type	Related Spatial Objective(s)	Related SA Objective(s)	Related Policy Wording	Target	Responsible Agencies	Implementation
<b>Land, Water and Resources</b>							
Number of dwellings completed (net)	Core indicator, Significant effects	1, 2, 3	16	2	550 per annum	Huntingdonshire District Council, Private Sector, Registered Social Landlords	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs
% housing completions on previously developed land	Core output, Significant effects	8, 12	1	2	29%	Huntingdonshire District Council, Private Sector, Registered Social Landlords	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs
Estimated household water consumption	Local output, Significant effects	12	2	1	Reduce pro capita water consumption rates	Huntingdonshire District Council, Private Sector	Through Planning Proposals DPD, Huntingdon West AAP, development

Indicator	Indicator Type	Related Spatial Objective(s)	Related SA Objective(s)	Related Policy Wording	Target	Responsible Agencies	Implementation
							control decisions SPDs and UDFs
<b>Biodiversity</b>							
Change in areas and populations of biodiversity importance:	Core output, Significant effects	8, 9	1, 3, 12	1, 9	Increase the number of ha of specified target habitats	Huntingdonshire District Council, Cambs Biodiversity Partnership, Natural England, RSPB	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs, Countryside Services Initiatives
1. change in priority habitats and species (by type)							
2. change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub-regional or local significance							
<b>Landscape, Townscape</b>							

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Indicator	Indicator Type	Related Spatial Objective(s)	Related SA Objective(s)	Related Policy Wording	Target	Responsible Agencies	Implementation
<b>and Archaeology</b>							
Large scale housing sites meeting 'Building for Life' equivalent standards	Local output, Significant effects	10, 11, 12, 13	4, 5, 10, 13	1	60% to achieve Silver Standard equivalent	District Council, Private Sector	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs, Conservation initiatives
<b>Climate Change and Pollution</b>							
% household waste which is recycled	Local output, Significant effects	12	8	1	50% by 2011 56% by 2016 60% by 2021	District Council, Cambridgeshire County Council	Provision of recycling facilities, Recycling campaigns, Cambridgeshire and Peterborough Joint Waste Strategy
% of housing completions in Market Towns and Key Service Centres	Local output, Significant effects	1, 12, 13	7, 9	2, 3	Maximise the % of housing completions in Market Towns and Key Service Centres	Huntingdonshire District Council, Private Sector, Registered Social Landlords	Through Planning Proposals DPD, Huntingdon West AAP, development

Indicator	Indicator Type	Related Spatial Objective(s)	Related SA Objective(s)	Related Policy Wording	Target	Responsible Agencies	Implementation
<b>Inclusive Communities</b>							
% of housing completions on qualifying sites which are affordable	Core output, Significant effects	2, 3	15, 16	4, 5	40%	Huntingdonshire District Council, Private Sector, Registered Social Landlords	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions
Amount of new residential development within 30 mins public transport time of GP, hospital, primary and secondary school, areas of employment and a major retail centre	Core output, Significant effects	1	14, 15	1	Maximise the amount of new residential development within 30 mins public transport time of GP, hospital, primary and secondary school, areas of employment and a major retail centre	Huntingdonshire District Council, Private Sector, Registered Social Landlords	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs
Number of permissions granted for new public or private Gypsy,	Core output	3	15, 16	6	Increase provision of pitches available on legal sites for	County Council, Registered Social Landlords, Private Sector	Through Gypsies and Travellers DPD and

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Indicator	Indicator Type	Related Spatial Objective(s)	Related SA Objective(s)	Related Policy Wording	Target	Responsible Agencies	Implementation
Traveller & Travelling Showpeople sites, or expansion of existing sites					Gypsies, Travellers & Travelling Showpeople		development control decisions
<b>Economic Activity</b>							
Amount and % of employment floorspace developed on previously developed land	Core output, Significant effects	6, 8, 12	1	7	Maximise the % of completed employment floorspace on previously developed land	Huntingdonshire District Council, Private Sector	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs
Amount of land for which planning permission has been granted for employment uses	Local output, Significant effects	4, 6, 15	17, 18	7	Annual average 4.3 ha	Huntingdonshire District Council, Private Sector	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs
% of retail completions in Huntingdon and St Neots	Local output, Significant effects	5, 7	14, 17, 18	8	Ensure a balance between the two main market towns of Huntingdon and St Neots	Huntingdonshire District Council, Private Sector	Through Planning Proposals DPD, Huntingdon West AAP, development

Indicator	Indicator Type	Related Spatial Objective(s)	Related SA Objective(s)	Related Policy Wording	Target	Responsible Agencies	Implementation
							control decisions SPDs and UDFs

# Monitoring

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## Reasonable Alternatives

.2 Consultation responses put forward a limited number of suggestions for additional indicators.

## Summary of draft Final Sustainability Appraisal

.3 Current government guidance requires the draft Sustainability Report to make proposals for monitoring to detect the effects of plan policies. In practice the Council retains responsibility for monitoring the LDF and also the effect of individual DPD policies. Its monitoring plan cannot be finalised until the DPD has been adopted, and therefore our contribution at this stage is to propose an outline monitoring programme based on the indicators listed in the Scoping Report, adapted to reflect any issues identified during the SA.

## Summary of Appropriate Assessment

### Consultation Responses

.4 Few responses were received on the monitoring proposals put forward. Some additional indicators were suggested primarily concerning biodiversity, climate change and recreation issues. Only one indicator was challenged - that of accessibility to key services being measured by being within 30 minutes public transport time.

### Assessment of Responses and Alternative Approaches

The responses mainly dealt with very detailed aspects of development the monitoring of which is better suited to the Development Control Policies DPD where specific policies influencing the details of development will be provided. The accessibility indicator is a national 'Core output' indicator required by government to facilitate comparable national and regional monitoring.

### Changes made

The household waste indicator has been changed to include composting.

## Tests of Soundness

.5 There are no particular concerns with compliance with the Tests of Soundness.

.6 Go East did not comment on this policy.

## Approach taken

.7 The approach taken is detailed in Volume 1 on page **x**.



# Issues not taken forward to Submission

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## Issues not taken forward to Submission


### Energy Use

#### Core Strategy Issues and Options

##### Issues and Options identified for Consultation

Issue 8: The need to reduce CO<sub>2</sub> emissions.

Option 27: Policies will promote energy efficiency and will set a requirement for the percentage of energy to come from on-site renewable energy developments.

Question 30: Should the plan require 10% of energy requirements to be met by on-site renewable energy sources or should a higher target be required? If a higher target should be required what should this target be?

Question 31: What size threshold should be used to determine whether on-site renewable energy technologies will be required?

#### Reasonable Alternatives

.1 The alternatives were identified within the options and questions given.

#### Summary of Initial Sustainability Appraisal for the Issues and Options paper

.2 The option is clearly sustainable in that it supports a high-profile international obligation on energy efficiency. The impact on the cost of providing affordable housing units is difficult to determine precisely, but there is assumed to be some uplift in price in the short term, which would be offset by falling costs of energy technology in the longer term rendering its impact neutral.

.3 Question 30 asks whether the target for on-site renewable energy generation should be 10% or higher. The 10% target should be readily achievable without a significant effect on house prices. A higher target would make a much stronger contribution towards reducing the use of non-renewable energy sources and reducing emissions of greenhouse gases, however this would have a more significant effect on house prices, particularly in the short term.

# Issues not taken forward to Submission

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## Consultation Responses to Issues and Options

.4 Responses to the options suggested that respondents accepted the need to reduce carbon emissions. Many supported the introduction of on-site renewable energy technologies although a few concerns were expressed about their potential impact on viability of developments. Quite strong support was expressed for a target of 10% of energy requirements to be met by on-site renewable energy sources with suggestions that these should be progressively increased or higher levels aspired to further in the future. Some respondents saw the Code for Sustainable Homes as a methodology for achieving carbon neutral developments in combination with use of building regulations and considered planning policy on the issue to be superfluous. A 10 dwelling threshold was the most frequent put forward with some support for applying on-site renewable technologies to all developments. A few respondents thought 50 dwellings a more appropriate threshold or that a site by site basis should be used.

### Assessment of Responses and Alternative Approaches

.5 Following the government's announcement of its intention to make the Code for Sustainable Homes mandatory it was deemed unnecessary to address the details of energy use in the Core Strategy. Therefore, the issue was not taken forward at the preferred options stage.

## Tests of Soundness

.6 As this has been incorporated into other policy areas it is not considered necessary to consider this against the Tests of Soundness.

## Approach taken

.7 Respondents' overall concern with the need to reduce carbon emissions has been taken into account in changes made to the objectives. Consideration of energy use has been transferred to the Development Control Policies DPD which will address the requirement for detailed policies suitable for helping to determine individual planning applications.


## Re-use of Military Sites

### Core Strategy Issues and Options

#### Issues and Options identified for Consultation

Issue 13: The need to identify the most appropriate future use of military sites which are, or become, redundant.

Option 36: Policies could set out the strategic approach to re-use of military sites and include criteria against which to assess potential suitability of different types of use.

# Issues not taken forward to Submission

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Option 37: The Core Strategy could state that due to the potential scale of development that could be accommodated consideration of the future of Alconbury Airfield should await consideration at the first review of the Regional Spatial Strategy.

Question 45: What uses would you like to see RAF Upwood put to?

Question 46: Should the Future of Alconbury Airfield await consideration at the first review of the Regional Spatial Strategy?

Question 47: Disregarding the potential timing of any redevelopment, what uses would you like to see Alconbury Airfield put to?

Question 48: What uses would you like to see the airfield part of RAF Wyton put to?

Question 49: If it becomes available, what uses would you like to see RAF Brampton put to?

## Reasonable Alternatives

.8 The alternatives were identified within the options and questions given.

## Summary of Initial Sustainability Appraisal for the Issues and Options paper

.9 Although it is difficult to fully appraise either option without knowing what type of development may be proposed, it is considered that, in principle, redevelopment of these areas would be sustainable. Redevelopment of airfields would use significant areas of brownfield land and reduce pressure for greenfield development. It was suggested that proposals for the re-use of military sites would have to take into account their accessibility and the impact of development on the surrounding area.

## Consultation Responses to Issues and Options

.10 Responses to the options suggested for the four main military bases that may have potential for re-development during the plan period were understandably mixed. Some respondents considered that the airfield element of any of them should be allowed to return to nature. RAF Upwood received reasonable support for re-use by a mixture of housing and employment within the existing built area. RAF Wyton received general support for a mixed housing and employment redevelopment with some favouring the whole area and others just within the existing built area. RAF Brampton received support for a housing led mixed use redevelopment. Most respondents considered the fate of RAF Alconbury should await the RSS review or that the existing employment permission should be implemented.

## Further Options Consultation

### Towards a Spatial Strategy

In consideration of options for further growth in the 'Towards a Spatial Strategy' document the airfields at Alconbury and Wyton were identified as possible locations for Eco-town development. These airfields are both significant brownfield sites within the District. As two potential sites were identified the option was considered in two parts considering these two locations for the new settlement.

# Issues not taken forward to Submission

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A New Settlement at Wyton Airfield would potentially give rise to an estimated 6,700 homes. An Eco-town at Alconbury Airfield would potentially give rise to an estimated 9,500 homes. Both would require significant development of employment, shops, infrastructure, services and facilities to ensure that they are sustainable. It is estimated that development would continue well beyond the end of the extended plan period of 2026 even if these options were taken forward at this time.

It was emphasised that the future of Alconbury Airfield could only be considered through review of the Regional Spatial Strategy.

## Summary of Initial Sustainability Appraisal for Towards a Spatial Strategy

.11 Both options for an Eco-Town were considered sustainable as they both direct growth towards substantial brownfield sites in the District, although they would require significant infrastructure provision. In terms of accessibility, it was considered that Wyton Airfield is potentially more sustainable as it could be served by an extended Guided Busway route in the future. However, the Eco-Town option was considered more appropriate for future considerations as there are more sustainable locations to create an Eco-Town outside of the District.

## Key Stakeholders' Responses

.12 The suggestion that RAF Alconbury could be developed as an eco-town to provide a long-term solution to growth pressures in the district received a reasonable degree of support although many concerns were expressed over potential timing and the need to await the RSS review.

## Assessment of Responses and Alternative Approaches

.13 The approach to redevelopment of military sites is incorporated into the Spatial Strategy where this is appropriate. The re-use of military sites is reflected in the spatial principles and the strategic growth options for the District. Although not proposed allocations at this stage, the key diagram shows strategic directions of growth indicating the potential for mixed use redevelopment at RAF Brampton and RAF Upwood.

.14 RAF Alconbury has an outstanding consent for employment use although it is acknowledged that this is extremely unlikely to be implemented. Due to the potential scale of development that could be accommodated consideration of the future of Alconbury Airfield should await the review of the Regional Spatial Strategy.

## Tests of Soundness

.15 As this has been incorporated into other policy areas it is not considered necessary to consider this against the Tests of Soundness.

## Approach taken

.16 Part of the option has been incorporated into the employment policy of the Submission Core Strategy. It was felt necessary to include Alconbury Airfield as a number of representations objected to the Preferred Options not being clear on the Council's intentions regarding Alconbury Airfield. In terms of potential redevelopment of Alconbury Airfield, this is not an issue that the Council is considering prior to an RSS review. It was put forward for consideration in Towards A Spatial Strategy for Huntingdonshire as a potential site for an Eco-Town. When

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consulted on this document, key stakeholders indicated that Alconbury should be favoured over Wyton - another site put forward for an Eco Town - but expressed concern at this process being progressed outside of the RSS and the RSS review.

## Appendix 1 Accession Assessment

### Transport Policy and Strategy / New Communities

#### Response to Huntingdonshire Core Strategy 2007 – Preferred Options

**1.1** This response to the Huntingdonshire Core Strategy 2007 – Preferred Options consultation considers the sustainable transport issues raised by the proposals for housing growth.

**1.2** The response is divided into two sections. The first outlines the broad principles that we believe should guide the selection of preferred housing development sites in the Core Strategy, while the second section applies accessibility mapping to the identified option sites to assess their suitability in terms of sustainable transport accessibility to key services and destinations.

**1.3** Please note that the housing sites that were modelled for the LDF Issues and Options consultation response in June 2007 have also been used in this modelling exercise. The methodology however has been considerably improved, in that the assessment now considers a greater number of key services and destinations. More details are given in the section, 'Modelling of Option Sites'.

#### General Principles

**1.4** The preferred housing sites should abide by principles set out in national and regional policy, as well as those of the Cambridgeshire Local Transport Plan.

**1.5** The key objective is to integrate land use and transport so that travel by sustainable modes is made more practicable and attractive, thus reducing reliance on the private car. To achieve this, new developments must be situated in the most accessible locations.

**1.6** High trip generating development such as employment and retail uses should be concentrated in areas well served by public transport and within low distances of large populations to encourage travel by foot or bicycle. As such town centre and edge of centre sites should generally be favoured. Similarly residential development is best located at sites close to and linked by public transport to a range of services.

**1.7** All development will contribute, to some extent, to pressure on the road network and on sustainable travel options. It is therefore expected that all developments will contribute towards measures to mitigate these pressures. When determining where to allocate development it should be considered that some option sites offer more potential for sustainable travel improvements at a lower cost than other options. Suitable infrastructure and services will need to be provided to realise this potential.

**1.8** For any development there must be sufficient capacity in the road network to support development-generated trips by all modes. This cannot be assessed at the present stage in the LDF process. When more detailed proposals for sites come forward during subsequent stages the capacity of the road network will be a key factor for consideration.

**1.9** It is also important to recognise the contribution that transport makes to building liveable communities.

#### Modelling of Option Sites

**1.10** Building on the above principles we have assessed the accessibility of each of the option sites considered in the Huntingdonshire Core Strategy – Preferred Options paper.

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**1.11** Accession, the Geographical Information System (GIS) application, was used to assess the accessibility of each of the potential broad housing locations. The following methodology and assumptions underpin the model:

## Accession-based housing site assessment

The assessment considers accessibility in two ways:

- The time it takes to travel from the site by *public transport* to key services and destinations
- The *distance* to travel from the site using the road network to key services and destinations – this acts as a proxy for how accessible a site is by walking and cycling, since distance is the major determining factor in why people choose to travel by these modes

The following key services and destinations are included in the assessment:

- Area of town centre activity
- Secondary School
- Primary School
- Supermarket
- Large Supermarket
- Leisure Centre
- G.P. Surgery
- Hospital with outpatient facility
- Hospital with accident and emergency facility – to act as a proxy for a large-scale hospital
- Library
- Retail Centre
- Area of Employment with more than 500 employees
- Area of Employment with more than 1000 employees
- Area of Employment with more than 2000 employees
- Area of Employment with more than 5000 employees (nb there are 6 such sites within Cambridgeshire: 3 in Cambridge, 1 in the ward of Milton, 1 in Huntingdon and 1 in Wisbech. Peterborough has 3 such sites)
- Area of Employment with more than 10000 employees (nb there are just two such sites within the vicinity of Huntingdonshire: 1 in Cambridge and 1 in Peterborough)

**1.12** The following points need to be considered when viewing the results of the GIS assessment:

- The assessment focuses on sustainable transport accessibility alone. It does not reflect the capacity of the road network to support increased trip levels, nor any non-transport related development control issues, such as deliverability or service provision.
- Each site has been assessed in isolation from all other option sites. The results therefore do not reflect the cumulative impact of developing several sites or land uses in one area (i.e. were a large-scale employment site to be developed close to a housing site, this would improve the accessibility of the housing site since it would be located close to one of the key services).
- The assessment only considers presently available transport infrastructure and services, not those that would be brought forward through the developments. The suitability of a site for development could be improved as a result of transport enhancements made as part of the development.

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- A walk distance of 800 metres has been assumed in the public transport modelling to represent the maximum distance that travellers would be prepared to walk to the nearest stop/station.
- The key destinations selected for assessing residential site options have been drawn from a variety of different sources including the County Council's Local Transport Plan and LDF Annual Monitoring 3b Indicators. Cross-boundary data has been obtained.
- Different time periods were used in the model for the public transport calculations, depending on the key destination – for example the time period used for accessibility to the areas of employment was 7-9am, the time period for accessibility to the nearest G.P. Surgery was 9am-12pm, whilst the time periods for accessibility to the nearest supermarket was both 9am-12pm and 6-9pm.
- Different criteria was used to determine what represented very good / good / acceptable / poor / very poor accessibility to different key destinations. For example, based on Planning Policy Guidance (PPG) 13 the criteria applied to the majority of destinations for the distance calculations was as follows:
  - Very good = less than 1km to key destination
  - Good = less than 2km to key destination (Maximum distance that walking is considered a viable alternative to the car according to PPG 13)
  - Acceptable = less than 5 km to key destination (Maximum distance that cycling is considered a viable alternative to the car according to PPG 13)
  - Poor = less than 8km to key destination
  - Very poor = more than 8km to key destination.

**1.13** For the majority of the public transport calculations the following criteria was used to determine the appropriate level of accessibility from each site to the key destinations:

- Very good = less than 10 minutes total travel time to key destination
- Good = less than 20 minutes total travel time to key destination
- Acceptable = less than 30 minutes total travel time to key destination (this is the threshold for public transport trips according to Government LDF Annual Monitoring Indicator 3b Guidance)
- Poor = less than 40 minutes total travel time to key destination
- Very Poor = more than 40 minutes total travel time to key destination.

## Results

**1.14** The option sites were assessed and grouped into one of five possible categories representing accessibility by sustainable modes to key destinations, based on the current road network and current public transport services. Table 1 below shows the average accessibility score of the housing locations for each spatial planning area:

**Table 9 Table 1: Accessibility Ranking of Potential Housing Locations**

Spatial Planning Area	No. of Homes Allocated	Avg. Score	Accessibility Rating	Key	
				Score	Accessibility Rating
Huntingdon Spatial Planning Area	1800 homes	2.29	Good	1 to 1.79	Very Good
St Ives Spatial Planning Area	500 homes	2.55	Good	1.8 to 2.59	Good
St Neots Spatial Planning Area	2600 homes	2.63	Acceptable	2.6 to 3.39	Acceptable



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Ramsey Spatial Planning Area	300 homes	3.20	Acceptable	3.4 to 4.19	Poor
Key Service Centres of Fenstanton, Sawtry and Yaxley	250 homes	3.34	Acceptable	4.2 to 5	Very Poor

1.15 Table 2 below shows the average accessibility score of each housing location modelled in the assessment:

**Table 10 Table 2: Accessibility Ranking of Potential Housing Locations**

Housing Site	Housing Description	Av. Score	Accessibility Rating	Key	
				Score	Accessibility Rating
Huntingdon B1	Brownfield, close to town centre	1.56	Very Good	1 to 1.79	Very Good
Huntingdon B2	Brownfield, close to town centre	1.78	Very Good		
Huntingdon C	Within built framework of town	1.81	Good	1.8 to 2.59	Good
Hunt'don (Godmanchester) I	Within built Framework of village	2.00	Good	2.6 to 3.39	Acceptable
St Neots O	Within built framework of town	2.00	Good	3.4 to 4.19	Poor
St Ives Q	Within built framework of town	2.28	Good	4.2 to 5	Very Poor
Huntingdon A	Greenfield, to north of town	2.44	Good		
Huntingdon (Brampton) G	Brownfield, extending to south	2.56	Good		
Huntingdon (Brampton) F	Within Built Framework of village	2.59	Good		
St Neots N	Greenfield, to east of town	2.59	Good		
Hunt'don (Godmanchester) J	Greenfield, to east of village	2.75	Acceptable		
Ramsey V	Within built framework of town	2.78	Acceptable		
St Ives P	Greenfield, to west of town	2.81	Acceptable		
St Neots (Little Paxton) L	Within built framework of village	2.91	Acceptable		
Yaxley BB	Within built framework of village	2.91	Acceptable		
St Neots (Little Paxton) K	Greenfield, to west of village	3.00	Acceptable		

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Huntingdon (Brampton) E	Greenfield, to west of village	3.09	Acceptable
Fenstanton W	Within built framework of village	3.25	Acceptable
Ramsey S	Greenfield, to north of town	3.25	Acceptable
Ramsey U	Brownfield, to southwest of town	3.31	Acceptable
Sawtry Y	Within built framework of village	3.38	Acceptable
Ramsey T	Greenfield, to west of village	3.44	Poor
Sawtry X	Greenfield, to west of village	3.59	Poor
Yaxley AA	Greenfield, to southwest of village	3.59	Poor

## Map showing accessibility assessment of potential locations for housing

**1.16** This can be found on the following page (below). Each star represents the centre point of each housing location. The colour of each star represents the average accessibility rating of each housing location.

### Analysis of Results – by Spatial Planning Area

**1.17** Table 1 shows that the average accessibility rating for sites within the Huntingdon and St Ives Spatial Planning Areas is 'good'. The average accessibility rating of sites within the St Neots and Ramsey Spatial Planning Areas is 'acceptable', as is the average accessibility rating of sites within the key service centres of Fenstanton, Sawtry and Yaxley.

#### *Huntingdon Spatial Planning Area*

**1.18** The Huntingdon Spatial Planning Area scored highest overall largely because the town of Huntingdon has 15 of the 16 key services located within its environs (the only key service Huntingdon does not have is an area of employment with more than 10,000 employees) and the villages of Godmanchester and Brampton are relatively close to the key services within Huntingdon.

**1.19** The time it takes to travel from the sites within the Huntingdon Spatial Planning Area to the key services located within Huntingdon by public transport is good.

#### *St Ives Spatial Planning Area*

**1.20** The St Ives Spatial Planning Area scored well largely because the majority of the key services are located within the town of St Ives. The only services not located within St Ives are an area of employment with more than 5,000 employees, an area of employment with more than 10,000 employees, a hospital with an outpatient facility and a hospital with an A&E department.

**1.21** The time it takes to travel from the sites within the St Ives Spatial Planning Area to the key services located within St Ives and Huntingdon by public transport is good.

#### *St Neots Spatial Planning Area*

# Accession Assessment

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**1.22** The St Neots Spatial Planning Area has very similar characteristics to the St Ives Spatial Planning Area. The majority of the key services are located within the town of St Neots. The only services not located within St Neots are an area of employment with more than 5,000 employees, an area of employment with more than 10,000 employees, a hospital with an outpatient facility and a hospital with an A&E department.

**1.23** The time it takes to travel from the sites within the St Neots Spatial Planning Area to the key services located within St Neots and Huntingdon by public transport is good.

## *Ramsey Spatial Planning Area*

**1.24** Sites within the Ramsey Spatial Planning Area scored lower than the other market town spatial planning areas because it has less key services located within its environs. The key services that are not located within Ramsey are areas of employment with more than 1000/2000/5000/10000 employees, an area of town centre activity, a hospital with outpatient facility and a hospital with an A&E department.

## *Key Service Centres of Fenstanton, Sawtry and Yaxley*

**1.25** Like Ramsey, the Key Service Centres of Fenstanton, Sawtry and Yaxley scored lower than the larger market towns because they have a lower number of key services located within or close to their environs. None of the potential housing sites within these villages are located close to a supermarket, large supermarket or areas of employment with more than 5000/10000 employees.

## **Analysis of Results – by town / village**

**1.26** Table 2 shows the accessibility rating for each location assessed in the modelling exercise. It can be seen that the top four sites are all contained within the Huntingdon Spatial Planning Area and the top two sites, both in Huntingdon, achieved an accessibility rating of 'very good'.

**1.27** All sites within the town of Huntingdon achieved a rating of either 'very good' or 'good'. Both sites in St Neots achieved a rating of 'good'.

**1.28** Sites in St Ives, Godmanchester and Brampton achieved accessibility ratings of both 'good' and 'acceptable'. All sites in Little Paxton and Fenstanton achieved accessibility ratings of 'acceptable'.

**1.29** Sites in Ramsey, Yaxley and Sawtry achieved accessibility ratings of both 'acceptable' and 'poor'.

## **Huntingdon**

### *Huntingdon B1*

**1.30** Public transport accessibility to all key services was rated as 'very good' from this site apart from accessibility to the nearest primary school, GP and area of employment with more than 10000 employees. However even for accessibility to these three key services the site achieved a rating of 'good' (the site achieved a rating of 'good' public transport accessibility to an area of employment with more than 10000 employees due to the proximity of the railway station, which makes it possible to travel to the nearest site in Peterborough in less than 30 minutes). Therefore in terms of public transport accessibility this site is excellent.

**1.31** In terms of accessibility by walking and cycling, this site is located very close to nearly all key services and therefore achieved a score of 'very good' or 'good' for each key service, the exceptions being accessibility to the nearest primary school for which it achieved a score of acceptable and area of employment with more than 10000 employees.

**1.32** Overall therefore this site achieved the highest sustainable transport score possible of 'very good'.

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## *Huntingdon B2*

**1.33** This site scored similarly to *Huntingdon B1* and also achieved the highest sustainable transport score possible of 'very good'. It scored marginally worse than *B1* for public transport accessibility to the nearest area of town centre activity, retail centre and leisure centre. It also scored worse than *Huntingdon B1* in terms of distance to the following key destinations: area of town centre activity, library, retail centre, GP, leisure centre, supermarket and large supermarket.

**1.34** However this site scored better than *B1* in terms of the distance to the nearest areas of employment with more than 500/1000/2000 and 5000 employees, primary school, secondary school, hospital with outpatient facility and hospital with an A&E department.

## *Huntingdon C and Huntingdon A*

**1.35** These sites both achieved an overall score of 'good' accessibility to key services. They scored less well than the *Huntingdon B* sites due to being located further from a number of the key services and having correspondingly longer public transport journey times.

## **St Neots**

**1.36** St Neots site *O*, located in the centre of town within the built framework, achieved an overall score of 'good' accessibility, as did St Neots *N*, located to the east of the town centre.

**1.37** Although they are both ranked within the same overall score of 'good' accessibility, *St Neots O* scored more highly than *St Neots N* in terms of the distance to the following key services: area of town centre activity, library, area of employment with more than 2000 employees, primary school, retail centre, GP, leisure centre, supermarket and large supermarket.

**1.38** *St Neots O* also scored better than *St Neots N* in terms of public transport accessibility to the following key services: area of town centre activity, library, area of employment with more than 1000 and 2000 employees, secondary school, retail centre, GP, leisure centre and large supermarket.

**1.39** It is anticipated however that since the development to the east of St Neots is likely to include several of the key services mentioned in the paragraphs above, the site's actual accessibility rating is likely to be higher than has been modelled here.

## **St Ives**

**1.40** St Ives site *Q*, located within the built framework of the town, achieved an overall score of 'good' accessibility, whilst St Ives site *P*, located to the west of St Ives, achieved an overall score of 'acceptable' accessibility.

**1.41** *St Ives Q* scored more highly than *St Ives P* in terms of the distance to the following key services: area of town centre activity, library, area of employment with more than 500/1000 and 2000 employees, primary school, retail centre, GP and large supermarket.

**1.42** *St Ives Q* also scored better than *St Ives P* in terms of public transport accessibility to the following key services: area of town centre activity, library, area of employment with more than 10000 employees, primary school, retail centre, GP, hospital with outpatient facility, supermarket and large supermarket.

**1.43** It ought to be noted that the accessibility score of both these sites is likely to improve with the introduction of the Guided Busway, bus priority measures between St Ives and Huntingdon and employment opportunities at the new town of Northstowe.

# Accession Assessment

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## **Godmanchester**

**1.44** Godmanchester site *I*, located within the built framework of the village, achieved an overall score of 'good' accessibility, whilst Godmanchester site *J*, located to the south-east of the village, achieved a score of 'acceptable' accessibility.

**1.45** It is possible to reach all 16 modelled key services within an acceptable public transport time frame from site *I*, whilst it is possible to reach all apart from an area of employment with more than 10000 employees from site *J*.

**1.46** Site *I* scored more highly than Site *J* in terms of distance to the following key services: area of town centre activity, library, primary school, retail centre, GP, hospital with outpatient facility, hospital with A&E department, supermarket and large supermarket.

**1.47** Site *I* also scored better than Site *J* in terms of public transport accessibility to the following key services: area of town centre activity, library, area of employment with more than 1000/2000 and 10000 employees, primary school, secondary school, retail centre, GP surgery, hospital with outpatient facility, leisure centre, supermarket and large supermarket.

## **Brampton**

**1.48** Brampton site *F*, located within the built framework of the village, and site *G*, a brownfield development extending to the south of the village, both achieved a score of 'good' accessibility. Site *E*, a greenfield site to the west of the village, achieved a score of acceptable accessibility.

**1.49** Each site within Brampton is within an acceptable distance of the following key services: area of employment with more than 500/1000/2000 and 5000 employees, primary school, secondary school, GP surgery, hospital with outpatient facility and hospital with A&E. Sites *F* and *G* were also within an acceptable distance of the nearest retail centre and leisure centre.

**1.50** It is possible to reach the following key services by public transport within an acceptable timeframe from each site in Brampton: area of town centre activity, library, area of employment with more than 500/1000/2000 and 5000 employees, primary school, secondary school, retail centre, GP Surgery, hospital with outpatient facility, hospital with A&E, leisure centre, supermarket and large supermarket. I.e. all key services modelled apart from area of employment with more than 10000 employees.

**1.51** Site *E*, located to the west of Brampton, scored less well than sites *F* and *G* because it is located further from the centre of Brampton and therefore further from the key services.

## **Little Paxton**

**1.52** Both sites in Little Paxton achieved an overall accessibility score of 'acceptable'.

**1.53** Both sites are within an acceptable distance of the following key services: area of town centre activity, library, area of employment with more than 500/1000 and 2000 employees, primary school, secondary school, retail centre, GP Surgery, leisure centre, supermarket and large supermarket.

**1.54** Likewise both sites within Little Paxton are within an acceptable public transport timeframe of the following key services: area of town centre activity, library, area of employment with more than 500/1000/2000 and 5000 employees, primary school, secondary school, retail centre, GP Surgery, leisure centre, hospital with A&E department, supermarket and large supermarket.

## **Fenstanton**

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**1.55** The site at Fenstanton is within an acceptable distance of the following key services: area of town centre activity, library, area of employment with more than 500/1000 and 2000 employees, primary school and retail centre.

**1.56** This site is also within an acceptable public transport timeframe of the following key services: area of town centre activity, library, area of employment with more than 500/1000/2000/5000 and 10000 employees, primary school, secondary school, retail centre, GP Surgery, hospital with A&E, leisure centre, supermarket, large supermarket.

## **Ramsey**

**1.57** Three of the four sites in Ramsey achieved an overall score of 'acceptable' accessibility: site *V*, located within the built framework of the town, site *S*, located to the north of Ramsey and site *U*, located to the southwest of Ramsey. Site *T*, located to the west of Ramsey, achieved an overall score of 'poor' accessibility.

**1.58** As explained above in 'Analysis of Results – by Spatial Planning Area', sites in Ramsey do not score as well as the other market towns because Ramsey has fewer of the key services located within its environs.

**1.59** Site *V*, although falling in the same overall band as *S* and *U*, scored better than all the other sites in Ramsey in terms of distance to the following key services: library, primary school, retail centre, GP Surgery, leisure centre and supermarket. Site *V* also scored better than all the other sites in terms of public transport accessibility to the following key services: primary school and GP surgery.

**1.60** Ramsey site *T* scored lower than all other sites in Ramsey in terms of public transport accessibility to the nearest GP Surgery and Supermarket.

## **Yaxley**

**1.61** Yaxley site *BB*, located within the built framework of the village, achieved a score of acceptable accessibility, whilst site *AA*, located to the southwest of the village, achieved a score of 'poor' accessibility.

**1.62** Both sites in Yaxley are within an acceptable distance of the following key services: library, area of employment with more than 500/1000 and 2000 employees, primary school and GP Surgery.

**1.63** Both sites are also within an acceptable public transport timeframe of the following key services: library, area of employment with more than 500,1000, 5000 and 10000 employees, primary school, secondary school, GP Surgery, hospital with an A&E department, leisure centre, supermarket and large supermarket.

**1.64** Site *AA* achieved the lower score of 'poor' accessibility because it scored lower than site *BB* in terms of distance to the following key services: library, area of employment with more than 500 employees, primary school, secondary school, GP Surgery and leisure centre and because it scored lower than site *BB* in terms of public transport accessibility to the following key services: area of town centre activity, library, area of employment with more than 500/2000/5000 and 10000 employees, primary school, secondary school, retail centre, GP Surgery, hospital with outpatient facility and leisure centre.

## **Sawtry**

**1.65** Sawtry site *Y*, located within the built framework of the village, achieved a score of 'acceptable' accessibility, whilst site *X*, a greenfield development located to the west of the village, achieved a score of 'poor' accessibility.

**1.66** Both sites in Sawtry are within an acceptable distance of the following key services: library, area of employment with more than 500 employees, primary school, secondary school, GP surgery and leisure centre.

# Accession Assessment

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**1.67** Both sites are within an acceptable public transport timeframe of the following key services: library, area of employment with more than 500 and 1000 employees, primary school, secondary school, GP Surgery and leisure centre.

**1.68** Site X achieved the lower score of 'poor' accessibility because it scored lower than site Y in terms of distance to the following key services: library and secondary school and because it scored lower than site Y in terms of public transport accessibility to the following key services: library, area of employment with more than 2000 employees, primary school, secondary school and retail centre.

## Conclusions

**1.69** This Accession-based assessment has provided an indication of which potential broad locations have the best accessibility under current transport conditions and are therefore most suitable for development.

**1.70** The study has shown that the spatial planning areas of Huntingdon, St Neots and St Ives are more appropriate to accommodate further housing development than the spatial planning area of Ramsey and the key service centres of Fenstanton, Sawtry and Yaxley. These results provide support to the preferred options for housing growth outlined by Huntingdonshire, which focus the majority of development on St Neots and Huntingdon.

**1.71** The capacity of the road network surrounding all the locations modelled in this study would first have to be assessed in detail in order to confirm the suitability of these locations for larger developments.

**1.72** All locations are likely to require a significant investment in transport infrastructure or services. Locations that performed less well are likely to require a proportionately greater investment if they are to sustainably support development.

# Accession Assessment

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Figure 1.1 Map of Accessibility of Hunts Potential Housing Sites





# Schedule of Representations

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## Appendix 2 Schedule of Representations

**2.1** This section sets out a summary of the representations received during the consultation on Preferred Options that took place between 30 November 2007 and 11 January 2008. Also set out here is the officer response to the representations and the action taken to modify the Core Strategy as part of the production of the Submission Version.

**Table 11 Representation Key**

Type	Description of Representation
O	Oppose
C	Comment
S	Support

**2.2** Please note that in some cases it has been necessary to amend summaries provided by consultees or to write summaries if they were not provided by the consultee.

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**Table 12 Representations received on the Introduction of the Preferred Options Core Strategy**

Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Edwards			6	C	An urgent review of roads including the A14, the A428 and the A1 is needed. Without improvements the growth in housing and businesses will not be possible.	The Core Strategy has been informed by a Transport Assessment to assess the impacts of development on the strategic highway network. The review the consultee seeks need to be carried out by the Highways Agency as the District Council is not responsible for the strategic highway network. Improvements to the A14 will alleviate problems of congestion and the physical barrier caused by the road. The Council recognises that careful phasing of greenfield development near to the A14 will need to be phased to coincide with A14 improvements.	Submission plan revised to include information provided by the Spatial Strategy Options Assessment in Appendix 1 of Volume 2.
Maydo Pitt	GO-East		67	S	Clear and concise particularly spatial strategy	Comments noted.	None needed.
Maydo Pitt	GO-East		69	C	Submission version will need to identify which extant saved local plan policies will be replaced/ superseded by the Core Strategy.	This information will be included in the Submission version of the Core Strategy.	Submission plan revised to include information in Appendix 3.
Geoff Keeble	Highways Agency		66	C	No attempt made to address the impact of the preferred option on the strategic highway network through modelling, and no comparison of the options in Towards a Spatial Strategy provided. Much of the development in the preferred option is reliant upon major transport improvement schemes (eg	The impact of development on the strategic highway network was being completed as the Preferred Options was published. The Council had been informed of progress made on the modelling which had informed the choice of Preferred Option. The modelling work will be complete for the Submission	Submission plan revised to include information in Appendix 1 Volume 2.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
					Ellington to Fen Drayton) which the Report does not acknowledge. In addition, no reference is made to demand management or measures to reduce travel in a meaningful way.	Core Strategy and this will clearly set out the impact on the strategic highway network for the Preferred Option.	
Ms Diane Millis	Woodland Trust		58	C	Incorporate the Woodland Trusts aims as listed.	These are too detailed to be included in the Core Strategy.	None
Mr Steven Harvey	n/a		134	O	Object to lack of objectives/policies relating to provision for rural services and emphasis on urban concentration which also fails to consider provision of appropriate growth. Include policy to support the provision of jobs, affordable homes, leisure and community facilities within existing rural communities.	Due to the nature of the Core Strategy the objectives and policies concentrate mainly strategic scale development. It is unrealistic to expect the Core Strategy to identify in detail development opportunities in rural areas as these are likely to be small scale, diverse and numerous. Provision is made in the Core Strategy for development in Key Service Centres and Smaller Settlements and for specific types of development in the countryside. Further references and clarification of these provisions will be included in the submission version.	Submission plan revised to clarify provision of rural housing in Policy CS5.
P Bryant	Somersham PC		90	C	Support strategy based on objectives and vision however, these should be properly drafted so as to avoid misinterpretation and should be used consistently.	The monitoring proposals will ensure that the objectives will be implemented consistently.	None needed.
Mr David Reavell	O&H Properties Ltd		204	S	Very clear and concise. We commend the concise nature of the Core Strategy	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Martin Leyland	Barratt Strategic		222	C	Very clear and concise.	Comments noted.	None needed.
Jockey Club Racecourses	Jockey Club Racecourses		626	C	The Core Strategy should contain a policy on tourist accommodation covering the development of camp sites chalets, or cabins for tourist accommodation that should be allowed in the countryside subject to environmental criteria as these facilities are becoming increasingly important in allowing the diversification and growth of rural businesses.	Suggestion not accepted. Tourist Accommodation is not considered to be a Core Strategy issue and will be covered in the Development Control Policies DPD.	None needed.
Marlborough Developments Ltd	Marlborough Developments Ltd		516	S	Very clear and concise	Support noted.	None needed
Kevin Walker	Hinchingbrooke Health Care NHS Trust		623	S	Support. Emphasise that HDC will need to work with Cambridgeshire PCT to ensure that all GP practices – those in St Neots in particular - are configured in an efficient and accessible way for the increased population in that area as a result of preferred spatial strategy. Adequate consideration needs to be given to access into the Hospital site for emergencies and to traffic generated by other nearby developments eg Regional College. Development needs to support the "Sustainable Hospital Project"	A Transport Assessment has been carried out using modelling work to forecast the potential impact of development on the strategic highway network and will be included in the Submission version. The Core Strategy is too high level to detail specific issues relating to development sites eg access into the Hospital site. This will be considered in more detail in the Huntingdon West Area Action Plan and Planning Proposals DPD.	Submission plan revised to include information taken from the Transport Assessment Appendix 1 of Volume 2.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Councillor Jennifer Bird	St. Neots TC		638	C	Identifies significant infrastructure requirements in St Neots prior to further development including: 1) road network, 2) town centre revitalisation, 3) adequate leisure facilities, 4) a new cemetery, 5) A428/A1 improvements, 6) land for employment, 7) secondary school provision, 8) foul water and sewage improvements and 9) adequate surface water drainage.	The Core Strategy is intended to be a high level document covering the whole District. It does not cover specific issues arising from potential development. Information relating to infrastructure requirements and phasing will be dealt with in a Masterplan, and submitted application as well as the Planning Proposals DPD. The forthcoming Planning Contributions SPD will give further guidance on infrastructure requirements expected from development.	None needed.
Tom Gilbert-Wooldridge	English Heritage	2	114	O	Not enough reference to how the environment (inc historic) will be maintained and enhanced. Reference is made in P1 Sustainable Development but not supported by other policies. Include locally distinctive policies relating to the historic built and natural environment with explicit reference to environment issues. Listed documents in evidence base relating to landscape and townscape not sufficient.	While it is acknowledged that more could be included concerning protection and enhancement of the environment it should be remembered that policies are to be read in conjunction with other policy documents such as the Landscape and Townscape SPD. Therefore it should not be necessary to have repetitive references to protection of the environment in each policy.	None needed.
Maydo Pitt	GO-East	2.10	68	C	Volume 1 should contain more cross references to Volume 2. Not always immediately clear in the reasoned justification which of the options considered at earlier consultation stages was taken forward eg housing and employment strategies.	Comments noted. Cross referencing and explanation of preferred options will be considered carefully for future documents.	Submission plan revised to include more cross referencing. More detailed information on previously considered options is provided in Volume 2.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr John Chase	Buckden PC	3.1	131	C	Support. Core Strategy addresses provision of infrastructure and employment as well as housing. Support concentration of growth east of St Neots although concerned over future development A428	Support noted.	None needed.
Mr Gary Parsons	Anglian Water	4.5	7	C	Recommends undertaking a water cycle strategy.	A Watercycle Study is being prepared.	Submission plan has been revised to take account of the Local Infrastructure Framework which also includes a Watercycle Study.
Ian Burns	Cambs PCT	4.6	159	S	Support intention to take into account SCS for LDF particularly important for health and well being.	A key requirement of the LDF is that regard is had to the Sustainable Community Strategy. The Council has always tried to ensure that the LDF has more than just regard to the SCS and that the two are prepared in tandem.	None needed.
Rose Freeman	The Theatres Trust	4.6	362	C	Support, especially recognition of cultural and leisure opportunities.	Support noted.	None needed.
Ian Burns	Cambs PCT	4.9	161	C	Hunts LSP has endorsed the new Sustainable Community Strategy and it is this which should be detailed	Both the CS and the SCS have been referenced as the SCS was in production when the Core Strategy Preferred Options were being prepared.	Submission plan revised to include appropriate references.
Rose Freeman	The Theatres Trust	4.11	363	C	Notes significance of the emerging Huntingdonshire Cultural Strategy	Comments noted.	Huntingdonshire Cultural Strategy has been added as a supporting document.
Geoff Keeble	Highways Agency	4.12	62	C	No transport assessment has been provided for the spatial strategy and although modelling work is underway, the results are still in the future. Unclear how HDC are able to take into account the	Transport Assessment is underway. Any required amendments will be made for Submission of the Core Strategy.	Submission plan revised to include information provided by the Transport Assessment in Appendix 1 of Volume 2.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Paul Cronk	Home Builders Federation	4.12	96	C	Evidence base needs to include a Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment.	A draft SHMA was available for the Preferred Options. The final version will inform the Core Strategy for submission.	Submission plan revised to take account of the completed SHMA.
Ian Burns	Cambs PCT	4.12	163	C	Not confident that recommendations of the rapid Health Impact Assessment were adequately taken into account; particularly important given the scale and location of housing proposals in St Neots. HIA should be added to the list of reference documents.	The referenced document has been taken into account, however the Council cannot give full weight to it as assessment of options A and D was not included.	Submission plan revised to include reference to Health Impact Assessment in Appendix 2 Volume 1.
Ian Burns	Cambs PCT	4.12	164	C	Recommend that future LDF development is informed by the Overarching Health Needs Assessment published in 2007 by Cambridgeshire PCT (Cambs PCT) and any subsequent Joint Strategic Needs Assessments (JSNAs) due to be published in 2008 be added.	The Core Strategy has been developed in close consultation with the Cambridgeshire PCT and the submission version responds to a number of issues raised (see subsequent representations). Any requirements for additional facilities will be taken into account. The Joint Strategic Needs Assessment was not available during preparation of the Core Strategy Submission Report and the Overarching Needs Assessment does not provide sufficient information on the number of facilities needed to be able to inform the Core Strategy.	Further work with the PCT will be required for subsequent DPDs.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Chris Blackman	Cambs CC	4.12	467	C	Acknowledge the Cambridgeshire and Peterborough Structure Plan Saved Policies in policy context boxes, along with the Draft RSS and relevant National Guidance. Reference could be made to the Sustainable Construction in Cambridgeshire Good Practice Guide and design guide (2007).	Reference to documents identified in the representation has been made in Volume 2. Further references in section 4 will be considered.	Submission plan revised to include Saved Policies in Appendix 3 and reference is made to Sustainable Construction in Cambridgeshire Good Practice and Design Guide in Appendix 2 of Volume 1. Volume 2 details the policy context boxes.
Adam Ireland	Environment Agency	4.12	533	C	Strategic Flood Risk Assessment sound to inform Core Strategy. Will need to be updated for future documents eg Planning Proposals	The SFRA has informed preparation of the Core Strategy. The Council has also been engaged in extensive consultation with the Environment Agency to ensure strategic development is directed away from areas of flood risk.	The SFRA will be updated for subsequent DPDs.
Taylor Woodrow Developments Ltd	Taylor Woodrow Developments Ltd	4.12	646	C	All documents contributing to the evidence base should be listed in the Core Strategy.	Volume 2 of the Preferred Options makes detailed reference to documents that have formed part of the evidence base for the relevant section. It is intended that a full list of documents will be included in the Submission Core Strategy.	Submission plan revised to include a list of documents that make up the evidence base in Appendix 2 of Volume 1.
Taylor Woodrow Developments Ltd	Taylor Woodrow Developments Ltd	4.12	647	C	No reference is made to a housing trajectory (or to an infrastructure trajectory) as forming part of the evidence base.	It is not clear as to what the consultee is referring when reference is made to an Infrastructure Trajectory.	Submission plan revised to include a Housing Trajectory in Chapter 6 Monitoring. The supporting text and reasoned justification for the infrastructure policy have been strengthened.



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Table 13 Representations received on Ch 5 Spatial Vision

Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr David Reavell	O&H Properties		216	O	To be an accurate portrait, the Spatial Portrait should include a paragraph on the dispersed pattern of smaller settlements - and the relationship between them and surrounding areas - which characterises much of Huntingdonshire.	Comments accepted. Detail as described will be included in the Spatial Portrait.	Submission plan revised to include reference to the historic form of villages common across the District in paragraphs 3.8 and 3.9 of Volume 1.
Martin Leyland	Barratt Strategic		228	O	To be an accurate portrait, the Spatial Portrait should include a paragraph on the dispersed pattern of smaller settlements - and the relationship between them and surrounding areas - which characterises much of Huntingdonshire	Comments accepted. Detail as described will be included in the Spatial Portrait.	Submission plan revised to include reference to the historic form of villages common across the District in paragraphs 3.8 and 3.9 of Volume 1.
Marlborough Developments Ltd	Marlborough Developments Ltd		517	C	To be an accurate portrait, the Spatial Portrait should include a paragraph on the dispersed pattern of smaller settlements - and the relationship between them and surrounding areas - which characterises much of Huntingdonshire	Comments accepted. Detail as described will be included in the Spatial Portrait.	Submission plan revised to include reference to the historic form of villages common across the District in paragraphs 3.8 and 3.9 of Volume 1.
Ian Burns	Camb's PCT	5.3	165	S	Supports the encouragement of regeneration of areas of deprivation within St. Neots, Huntingdon and	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr S Ross	n/a	5.4	98	O	Ramsey, which will reduce health inequalities and promote social inclusion. Adjoining Peterborough and the Hamptons, Yaxley lies in a particularly sustainable location, similar to Godmanchester being close to Huntingdon and is capable of accommodating more development than other key service centres. It can take more development than is required merely to sustain local services and facilities.	It is not considered appropriate to include specific detail about individual Key Service Centres, however more detail may be included about the character and nature of the district outside of the 4 market towns. Yaxley has been identified as a Key Service Centre and as a suitable location for large scale development. This is considered to be the most appropriate approach given the services and facilities available in the village and the accessibility of services and facilities in Peterborough.	None needed.
Mr Tim Fryer	Brampton PC	5.5	315	C	Typo in 5th line.	This will be corrected for the submission version.	Submission plan revised to correct spelling error.
Mrs Lynn Targett	n/a	5.7	22	C	The village of Bury has not merged with Ramsey and deserves as much recognition as any of the other villages in Huntingdonshire, and its current treatment is in fact against the Spatial Vision and the Objectives of the Core Strategy.	Bury has been regarded as part of the market town of Ramsey since the adoption of the Local Plan Alteration due to its functional dependence and proximity to Ramsey. It is not considered necessary to change this approach. Consideration will be given to how best to recognise the close proximity of Bury and Ramsey.	None needed.
Strawsons Devt t/a Omnivale	Strawsons Devt t/a Omnivale	5.7	548	O	Delete all after sentence 3 in 5.7, replace with "Although Ramsey is relatively remote and lies off the primary road network, it has functioned	Suggestion not accepted. Although the first part is considered appropriate, the second part should not be included in the Spatial Portrait as it goes beyond the descriptive role of the portrait.	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
					<p>historically as a service and employment centre for this part of Huntingdonshire and the Fens. However, its service and employment role has been eroded in recent years and the Town is somewhat run down and in need of regeneration.. It continues to be the focus of a number of regeneration initiatives and is developing its heritage assets. However, these initiatives will not in themselves be sufficient to arrest the trend of decline. There is an opportunity for development on a moderate scale (in strategic terms) in the future to stimulate and facilitate economic, social and physical regeneration, by creating new jobs, by broadening the range and type of housing and by providing new or improved community infrastructure and services; in order to create and maintain a balanced and sustainable community, to restore and consolidate the town's traditional role in the settlement hierarchy</p>		

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Gareth Ridewood	CPRE	5.11	72	S	Should recognise the importance of the Ouse Valley, its flood meadows and associated biodiversity.	There is already a clear reference to the Ouse Valley in paragraph 8.8 and this will be included in the submission version.	None needed.
Ms Diane Millis	Woodland Trust	5.11	60	S	The Woodland Trust supports the reference to its sites. However, the Regional Woodland Strategy for the East of England - 'Woodland for Life' (EERA/ Forestry Commission 2003) should be acknowledged and supported.	The Council aspires to meet the targets set out in the strategy however, the Core Strategy is intended to be a high level strategic document in which such specific targets are inappropriate. The document Woodlands for Life will be considered in more detail when preparing the Development Control Policies DPD.	The Woodland Strategy will be considered when preparing the Development Control Policies DPD.
Chief Engineer	Middle Level Commissioners	5.12	371	C	Reference should be made to the Middle Level Commissioners' system which controls the support link route connecting the EA's River Nene and Great Ouse.	Additional reference is appropriate.	Submission plan revised to include reference to the network of waterways in paragraph 3.15
Rose Freeman	The Theatres Trust	5.12	364	C	Note that Tourism and leisure are important contributors to the local economy	The important contribution that tourism makes to the local economy will be referenced.	Submission plan revised to include reference to tourism and the local economy in paragraph 3.15 and objective 5.
Ms Diane Millis	Woodland Trust	5.13	71	S	Green infrastructure is more than just a series of linear green corridors linking biodiversity areas. It should be defined here as:	Support noted. It is considered appropriate to include green infrastructure in the glossary.	Submission plan revised to include definition of green infrastructure in the glossary (appendix 1).

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Steven Harvey	n/a	5.13	135	S	<p>"a broad network of multifunctional greenspace which helps provide a natural life support system for people benefiting health, recreation, flood amelioration, carbon sequestration and local biodiversity."</p> <p>Support this statement that the creation of balanced sustainable communities requires timely provision of infrastructure and that infrastructure is more than just the physical provision of utility services and highways;</p>	Support noted and this aspiration has been incorporated into a strengthened implementation chapter.	Submission plan revised to incorporate this aspiration into the implementation chapter.
Ian Burns	Cambs PCT	5.16	169	O	<p>Should reflect all health care service requirements.</p> <p>Suggested wording: "Cambridgeshire Primary Care Trust is responsible for the overall commissioning of health care services in Cambridgeshire. National and local health policy is seeking to provide a greater range of healthcare services in accessible locations, closer to patients' homes. Considerable expansion and improvements to the community based Health infrastructure in</p>	Some of the proposed wording is considered acceptable and will be included.	Submission plan revised to include more information on the responsibilities of the PCT in paragraph 3.22. Additional detail has been included on local provision of healthcare. The proposed wording has been included in full in paragraph 5.96.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Geoff Keeble	Highways Agency	5.18	48	C	<p>Huntingdonshire will be required during the period covered by the Core Strategy. The PCT identifies potential sources of capital and revenue funding for health infrastructure, including contributions from new housing developments."</p> <p>Prior to the completion of the A14 Ellington – Fen Ditton improvement scheme, the HA is unlikely to be able to support the provision of any new development likely to impact upon the Trunk Road, as additional new development-related traffic will further exacerbate the strategic highway network congestion. The District should demonstrate cognisance of the recently published Circular 02/2007 (Planning and the Strategic Road Network) and government guidance regarding transport assessments within their LDF documents.</p>	<p>The Council is well aware of the HA's concerns about development and the impact on the strategic highway network. It is however considered to be impractical to have a complete moratorium on developments. The Council and consultants commissioned to carry out the TA have had full regard to Circular 02/2007.</p>	<p>Submission plan revised to significantly strengthen the Infrastructure and Implementation chapter and include information provided by the TA in Appendix 1 of Volume 2.</p>
Ms Diane Millis	Woodland Trust	5.18	73	C	<p>Woodland Trust seeks a statement that any new transport schemes should not directly</p>	<p>While the importance of Ancient Woodland is not disputed and the Council will do everything it can to ensure its protection, it is not possible</p>	<p>None needed, further information on protecting ancient trees and ancient woodland</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Tim Fryer	Brampton PC	5.18	316	C	<p>necessitate the removal of ancient woodland and ancient trees</p> <p>Brampton PC considers that removal of the A14 viaduct may not improve local road access to Huntingdon town centre but will have a detrimental effect on local traffic. Specific attention should be given to improving access to Huntingdon railway station.</p>	<p>to guarantee against adverse impacts from infrastructure development which is out of the control of the Council. The protection of ancient trees and woodlands is an issue that will be dealt with in more detail in the Development Control Policies DPD.</p> <p>It is the Council's opinion that it should be possible to improve access based on studies under taken by Cambridgeshire County Council. Improvements to access for Huntingdonshire railway station should be possible but could be considered as part of the Huntingdon West Area Action Plan.</p>	<p>will be provided in the Development Control Policies DPD.</p> <p>None</p>
Geoff Keeble	Highways Agency	5.19	49	C	<p>The HA notes that there are no proposals for the widening of the A1428 between the A1 and Caxton in the the East of England Plan. Without grade-separation, severe congestion is forecast to occur in 2021 at the approaches to the A1/A421/A428</p>	<p>Clarification of the issue raised in the representation should be made.</p>	<p>Submission plan revised to clarify the point made in paragraph 5.84</p>
Connolly Homes Plc, David Wilson Es	Connolly Homes Plc, David Wilson Estates	5.19	433	S	<p>Supports the provision of a High Quality Public Transport Corridor along the A428 between St Neots and Cambridge and improvements to the A428 between Caxton Gibbet and the A1. This would support housing and employment</p>	<p>Support noted. The Infrastructure section will be rewritten to clarify the Council's approach to developer contributions and any standard charges including the CIL</p>	<p>Submission plan revised to strengthen Implementation Chapter which has been informed by the Local Infrastructure Framework. The Chapter clearly sets out the Council's approach to developer</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
					growth, including the growth to the East of St Neots. Developer contributions should be proportionate to the impacts, recognising there is already a sub-regional requirement for such infrastructure.		contributions and CLI (particularly paragraph 5.98).
Ms Diane Millis	Woodland Trust	5.20	74	S	Climate change is the greatest single threat to the long term survival of ancient woodland. The Woodland Trust supports the emphasis on public transport, cycling and walking as more sustainable modes of transport to reduce carbon emissions.	Support noted.	None needed
Ian Burns	Cambs PCT	5.21	172	S	Seeks a commitment to improving access to NHS sites. The Hunts NHS Travel Planning Sub-Group, wish to ensure that patients and staff needing to travel to NHS sites across Hunts are able to do so in ways which both increase accessibility and promote sustainable ways of travelling.	The Core Strategy is intended to be a high level strategic document and it is not appropriate to include such detailed information in it. Where appropriate, issues of access to the Hospital site will be covered by the Huntingdon West AAP.Support noted.	None needed.
Mr Steven Harvey	n/a	5.22	137	O	Objects to the fundamental failure to reflect the Government's emphasis on the	The PPS1 Climate Change supplement was published after the Preferred Options it was therefore impossible to take its content into account or make reference to it. It is acknowledged that the draft of this supplement was	Submission plan revised to include reference to PPS1 Climate Change in Volume 2 in the policy context.



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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
					<p>creation of balanced healthy and sustainable communities.</p> <p>Should make direct reference to PPS1 Climate Change requirements to take account of 'the capacity of existing and potential infrastructure (including for energy supply, waste management, water and sewerage, and community infrastructure such as schools and hospitals) to service the site or area in ways consistent with cutting carbon emissions and successfully adapting to likely changes in the local climate'.</p>	<p>available and this has been referenced in Volume 2. However the extent to which the draft could be taken into account was limited as the final version could have change substantially as has been seen with PPS3. The Core Strategy will be amended where necessary to take into account the PPS1 supplement and make more explicit reference to it.</p>	
Mr Michael Palmer-Asplin	n/a	5.23	23	C	<p>Greater clarity and transparency is sought in the derivation of the housing completion and permissions figures in para 5.23, particularly the origin of the 8,500 dwellings completed/permitted since 2001. It should also demonstrate that there has been no double-counting and that demolitions/amalgamations have been taken into account.</p>	<p>It is accepted that more detail as to housing delivery and requirements for the plan period should be given in the Core Strategy. It is considered that this information is best provided in the policy and supporting text of the Strategic Housing Growth policy.</p>	<p>Submission plan revised to include information on housing completions within policy CS2.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Geoff Keeble	Highways Agency	5.23	50	C	The additional 2,750 homes be required between 2021 and 2026 is the same as that put forward in 'Towards a Spatial Strategy for Huntingdonshire'	The housing requirement that the Council is planning for has not changed from Issues and Options as no changes to the housing requirements for Huntingdonshire have been made to the East of England Plan. Comments noted.	None needed.
Connolly Homes Plc, David Wilson Es	Connolly Homes Plc, David Wilson Estates	5.23	436	O	The Core Strategy suggests a residual requirement for 2750 dwellings in the period to 2021 and an extra 2750 homes to allow for a 15 year supply of housing upon. Expresses concern that this appears to assume that 100% of the identified land with planning permission will be implemented/ built out. As the Council cannot exactly determine how many units will be delivered on committed land within the Plan period, a flexibility allowance is essential.	The Strategic Housing Development policy is flexible as, when identifying numbers of dwellings to be built, reference is made throughout to "at least." Additional information on existing commitments will be provided. This policy is supplemented by Policy CS3 which provides for windfall development and is sufficiently flexible.	Submission plan revised to include information on existing commitments in Policy CS2.
Lands Improvement	Lands Improvement	5.23	351	O	There is no detailed breakdown of the housing figures in terms of how many have actually been built or what the figure is for existing planning permissions. It would also seem that there has been no discounting applied to the existing permissions for sites	RSS rate from 2006 to 2021 for Huntingdonshire is 550. The RSS makes it clear that it is this rate that should be used to ensure 15 year supply.	Submission plan revised to include information on existing commitments in Policy CS2.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Taylor Woodrow Developments Ltd	Taylor Woodrow Developments Ltd	5.23	645	S	that may not be constructed. It is therefore not possible to analyse the Council's housing calculations. Supports the Core Strategy providing for the housing requirement through to 2026	Support noted.	None needed.
Twigden	Twigden Homes	5.23	565	O	Paragraph 5.23 identifies the requirement for 2021-2026 as 2,750 dwellings. This should be 2,800 dwellings in line with the rate set out within the East of England Plan.	The consultee is incorrect. The RSS clearly identifies the yearly delivery requirement for the period from 2006 to 2021 for Huntingdonshire to be 550. It is also clear that this rate should be used in order to plan for the 15 year period required by PPS3.	None needed.
Mr Steven Harvey	n/a	5.24	138	O	Fails to reflect the Government's emphasis on the provision of housing to meet the local needs of rural communities, in terms of sheltered housing for elderly people, special needs housing, 'intermediate' shared equity housing, small 2/3 bed 'starter' homes, adaptable 'lifetime homes' for the ageing population, live/work units and housing designed to encourage people to work from home, together with appropriate childcare, educational, health, community and 'green'.	The paragraph makes no reference to rural housing need. This paragraph will be added to with further detail of the housing need in the District.	Submission plan revised to include additional detail on housing need in paragraph 3.27 and the reasoned justification of policy CS4.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Steven Harvey	n/a	5.25	139	O	<p>infrastructure to support a balanced, healthy and sustainable community.</p> <p>The needs of rural communities will not be satisfied simply by the addition of small clusters of new social rented houses.</p> <p>Fails to acknowledge and respond to the needs of residents outside the four main urban areas (over half the population) to travel less and work nearer home; should provide local solutions to job provision and positive support for employment creation district-wide, not just within urban areas, and support mixed use development as the most sustainable option.</p>	<p>It is proposed to expand the information and detail in the Spatial Portrait about employment and the economy of the district. Paragraph 5.25 deals with the requirements for employment development in the Planning context such as the requirements from the EEP.</p> <p>It is not clear in the representation what the consultee is referring to when referencing PO2 as policy 2 in the Preferred Options deals with strategic housing and not employment.</p>	<p>Submission plan revised to include more information on the economy in paragraphs 3.13 and 3.14. The spatial strategy ensures covers key service centres outside the main urban areas and other policies, such as policy CS5 deals specifically with the housing needs of rural communities.</p>
R W Dew and Son Ltd	R W Dew and Son Ltd	5.26	11	C	<p>There is a need to make allowance for small scale employment development (new development or change of use of existing buildings/sites) in villages - this would be consistent with the emerging Hunts Sustainable Community Strategy.</p>	<p>Small scale development for employment in villages would not take place on a strategic scale. The Development Control Policies DPD will consider appropriate policies on this matter.</p>	None

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Geoff Keeble	Highways Agency	5.27	51	C	The quantum of retail floorspace is the same as that put forward in "Towards a Spatial.	No change has been made to the quantum of retail floorspace, informed by the Retail Assessment, since Issues and Options.	None needed.
Churchmanor Estates Company Plc	Churchmanor Estates Company Plc	5.27	245	C	The Retail Assessment Study has a relatively low aspiration in only aiming for a "slight increase" in the proportion of expenditure retained locally as a result of a more attractive retail offer.	Although the Retail Study aspires to a 'slight increase' the amount of retail floorspace development need to achieve this is substantial. It is considered that 20,000sqm of comparison floorspace will not be easy to achieve. It is also considered appropriate to try to achieve incremental improvements as much larger changes will be difficult to maintain and could bring unexpected detrimental side effects.	None needed.
Stanton Group Developments Ltd	Stanton Group Developments Ltd	5.27	428	C	Supports the additional policies proposing further retail development but it should be made clear that the quantitative figures do not represent a ceiling of provision that is not to be exceeded but a general order of provision.	Policy Wording 8 is clear that the 20,000sqm is not considered to be a maximum. This policy will be taken forward into the Submission Core Strategy	None needed.
Churchmanor Estates Company Plc	Churchmanor Estates Company Plc	5.28	246	O	Paragraph 5.29 does not deal with convenience goods shopping due to the small quantity of convenience floorspace involved. This is inappropriate as this should be part of the overall retail strategy and must be a strategic consideration.	It is considered that the amount of convenience floorspace that is required is low and because the figure could easily be taken up by relatively minor development it is not necessary to make specific provision in the strategy. This paragraph will be expanded to better clarify the approach to convenience floorspace provision.	Submission plan revised to clarify the Council's approach to convenience floorspace provision in paragraph 3.32 and later in paragraph 5.56 in the reasoned justification for policy CS8 (land for retail development).

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Stanton Group Developments Ltd	Stanton Group Developments Ltd	5.28	434	S	Support the statement that retail convenience floorspace should follow housing development.	Support noted.	None needed.
Strawsons Devt t/a Omnivale	Strawsons Devt t/a Omnivale	5.29	549	C	The vision is supported but is considered to be inconsistent with the supporting text. 5.7 is inconsistent with the reasoned justification. Refer to rep on 5.7 for suggested revision.	The consultee does not make it clear in this representation how they consider the Vision and spatial portrait to be inconsistent. The consultee is also unclear what changes they expect to be made to remedy the alleged inconsistencies. The consultee's representation on paragraph 5.7 is not accepted and without any further indication of changes that should be made no change is proposed.	None needed.
Miss Maydo Pitt	GO-East	The Spatial Vision	35	O	GO-East considers that the spatial vision is still not spatially specific and does not explain where growth will be. The vision should provide an indication of where the main growth (retail, housing and employment) will take place and broadly how much. In particular: - the vision could be expanded so that, effectively, a picture is painted of a new scenario at the plan end date that has come about as a result of matters such as new development, environmental improvements, social and economic factors	The issues raised in this representation will be considered, however it should be noted that the Spatial Principles provides much of the information considered necessary.	Submission plan revised to incorporate elements of the spatial principles in the vision to provide the spatial specificity and local distinctiveness required.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
					<ul style="list-style-type: none"> <li>- there could be a greater spatial emphasis in terms of where the focus of change in the district will occur</li> <li>- the needs of specific settlements (e.g. key issues such as employment and housing) could be referred to in the vision statement</li> </ul>		
Ms Diane Millis	Woodland Trust	The Spatial Vision	75	S	The Woodland Trust supports the vision for Huntingdonshire, especially its acknowledgement of the need to respect, maintain and enhance 'the special characters of its towns, villages and countryside' and its aim to see residents have improved access to green infrastructure as part of an improved quality of life.	Support noted.	None needed.
Mr Philip Raiswell	Sport England	The Spatial Vision	146	S	Sport England supports the broad content but feel that it could be strengthened by direct reference to a healthier, more active population. Sport has an important role in this.	Reference to healthier and more active lifestyles will be included in the Vision.	<p>Submission plan revised to strengthen and expand the vision.</p> <p>More reference included in the vision to promote healthier and more active lifestyles, especially in relation to recreation and green infrastructure.</p>
Mr Steven Harvey	n/a	The Spatial Vision	140	S	Supports the view that the Core Strategy must achieve the 'vision' of sustainable	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Tom Gilbert-Wooldridge	English Heritage	The Spatial Vision	115	C	development in a predominantly rural area that provides 'an improved quality of life'; Welcomes the overall focus of the revised spatial vision, particularly the reference to the maintaining and enhancing the district's distinct identity and character. However, seeks explicit reference to the natural, historic and built environment within the vision. By replacing "towns, villages and countryside" in the 4th and 5th lines with "natural, historic and built environments".	The vision will be strengthened to include explicit reference to the historic environment.	Submission plan revised to strengthen the vision and emphasise the need to protect the character of the natural, historic and built environments in the District.
Mr Justin Tilley	Natural England	The Spatial Vision	310	S	Supports the emphasis on the need to maintain and enhance local character and the recognition of the importance of green infrastructure in contributing to quality of life	Support Noted.	None needed.
Mr David Reavell	O&H Properties Ltd	The Spatial Vision	218	C	The reference to economic vitality in the Spatial Vision is ambiguous as is the term 'in a sustainable manner' and should be redrafted for clarity. Does this statement mean that employment and economic growth will be encouraged	The vision will be strengthened and clarified.	Submission plan has been revised to strengthen the vision. The aspiration to promote economic development in a sustainable manner has been incorporated in other areas of the vision and linked to employment and



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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Martin Leyland	Barratt Strategic	The Spatial Vision	219	C	<p>within the District or that benefits will be felt from economic growth outside Huntingdonshire but within the sub-region?</p> <p>The reference to economic vitality in the Spatial Vision is ambiguous as is the term 'in a sustainable manner' and should be redrafted for clarity. Does this statement mean that employment and economic growth will be encouraged within the District or that benefits will be felt from economic growth outside Huntingdonshire but within the sub-region?</p>	<p>The vision will be strengthened and clarified.</p> <p>Submission plan has been revised to strengthen the vision. The aspiration to promote economic development in a sustainable manner has been incorporated in other areas of the vision and linked to employment and sustainable patterns of growth to clarify how it can be achieved.</p>	
Mrs Madeleine Liddiard	Godmanchester TC	The Spatial Vision	334	S	Supports the Vision.	Support noted.	None needed.
Mr Steven Harvey	n/a	The Spatial Vision	532	O	<p>Objects to the emphasis on 'urban concentration' which fails to recognise the local distinctiveness of the district and disregards the needs of over half the population, including an increasing proportion of elderly people. By severely restricting the supply of housing in rural areas, the policy approach will</p>	<p>The cost of housing in the district is determined by a great number of factors, most of which are external to Huntingdonshire. Regard is had to the Local Economic Strategy in the Core Strategy.</p> <p>It is considered to be unsustainable to plan for substantial development in rural areas. The Core Strategy has a strategic role to play and identifies locations for large scale growth but also makes provision for development in key service centres and other villages of an appropriate scale. To expect these factors to be specifically referenced in the Vision is unrealistic.</p>	<p>Submission plan revised to explicitly support limited development in larger villages.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Gates Hydraulics	Gates Hydraulics	The Spatial Vision	468	S	Supports the contents of the spatial vision, in particular the requirement for development to be undertaken in a sustainable manner which respects, maintains and enhances the special characteristics of the towns, villages and in particular the countryside within Huntingdonshire.	Support noted.	None needed.
Marlborough Developments Ltd	Marlborough Developments Ltd	The Spatial Vision	520	O	The reference to economic vitality in the Spatial Vision is ambiguous as is the term 'in a sustainable manner' and should be redrafted for clarity, particularly the reference to taking "advantage of the economic vitality of the Cambridge Sub Region in a sustainable manner".	Consideration has been given to how best to clarify the identified parts of the vision.	Submission plan revised to clarify the vision and the aspiration of sustainable economic development is made clear.
Mr Steven Harvey	n/a	5.30	141	O	The vision will not be achieved unless it incorporates positive measures to make the smaller settlements more sustainable in terms of employment, mix and type of housing, services and	In order to maintain the strategic nature of the Core Strategy the Preferred Options specifically identify only those locations that are considered to be suitable for large scale development. The Settlement Hierarchy makes provision for appropriate scales of development in key service centres and smaller settlements. It is however not considered appropriate to specifically	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
					<p>facilities and environmental quality. It needs to address:</p> <ul style="list-style-type: none"> <li>• rural unemployment;</li> <li>• elderly people in rural areas being unable to afford suitable housing and being forced to move out of their 'home' communities;</li> <li>• young people in rural areas being unable to find local employment and afford suitable housing and being forced to move out of their 'home' communities;</li> <li>• lack of and loss of local services, leisure, recreation and community facilities as residents are forced to commute to find work, shops, services and facilities elsewhere;</li> </ul>	<p>identify small development opportunities. The vision sets out the aspirations for the district and it is not appropriate to include such detailed information in the vision.</p>	
Ms Diane Millis	Woodland Trust	5.32	76	C	<p>The Woodland Trust is concerned that the quality of the environment and biodiversity is not sufficiently represented in this paragraph. The environment appears to be covered only by the latter point: 'to live in an environment that is protected from the effects of climate change' which fails to consider the need to enhance biodiversity for</p>	<p>Consideration will be given to how the issues raised in this representation can best be incorporated in to the vision. The consultee is referring to the vision in the SCS and not the Core Strategy.</p>	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Martin Leyland	Barratt Strategic		230	O	<p>its own sake and the wide range of benefits that a protected and expanded natural environment can contribute to the people and economy.</p> <p>Fails to recognise the contribution can be made to the growth opportunities in the north of the district, relating to and supporting Peterborough's growth.</p> <p>Huntingdonshire is a key part of the Government's Growth Area and there is a need to work jointly with Peterborough City Council to develop a long term growth strategy.</p> <p>Land to the north and north west of Yaxley presents an alternative sustainable location for growth.</p>	<p>The Council recognises the important contribution that the northern part of the District offers for growth and for promoting biodiversity and green infrastructure and PCC is always consulted. However, as set out in the East of England Plan growth should follow the hierarchy in CSR1 which states that, following a preference for growth in and on the periphery of Cambridge and in Northstowe, growth should be accommodated in the market towns of the sub-region. The spatial strategy does recognise the opportunities in Yaxley, but also acknowledges the high levels of growth it has accommodated in recent years. This should be reflected more clearly in the vision.</p>	<p>Submission plan revised to strengthen the vision and include reference to the relationship that the northern part of the District has with Peterborough and the role it plays in being an important green resource for the expected population growth.</p>
Mrs Madelaine Liddiard	Godmanchester TC		335	S	<p>Support with the exception of the reference to the redundant military bases – Upwood, Wyton, Alconbury. These sites should be given preference over Greenfield sites. Particularly, Alconbury has potential as eco</p>	<p>The future of the airbases in the district is an important issue. The future of Alconbury in particular, is an issue the Council has consulted on and the majority of respondents supported awaiting the RSS review. It is considered that Alconbury's future is an issue that needs to be considered within the wider regional arena in order to ensure the most sustainable locations and scale of growth are</p>	<p>Submission plan revised to clarify the Council's approach to re-using redundant airfields in volume 2.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Ewen McLeod for Wrenbridge Land Ltd	Wrenbridge Land Ltd	5.33	262	S	Should also refer to the special opportunities presented by the committed improvements to the strategic road network, particularly the A14 improvements in the vicinity of Huntingdon, to enable B8 uses to be developed that are readily accessible to this network, such as on the site of the former Alconbury Truckstop.	It is not appropriate for the Core Strategy to refer in detail to specific sites and detail potential uses. The submission plan will include more detail in the Implementation chapter which will cover the implications brought by the A14 improvements.	Submission plan revised to strengthen the Infrastructure and Implementation chapter.
Connolly Homes Plc, David Wilson Es	Connolly Homes Plc, David Wilson Estates	5.33	439	S	Supports the Spatial Principles to locate the majority of growth in Huntingdon, St Neots and St Ives as the market towns which are within the Cambridge Sub-Region.  For retail growth, supports the creation of a new district centre to the east of the railway line at St Neots	Support noted.	None needed.
R W Dew and Son Ltd	R W Dew and Son Ltd	Spatial Principles	12	O	Amend Para 5.39/40 to support small scale employment development in key service centres	Small scale employment development in KSC would not be on a strategic scale. The Development Control Policies DPD will consider appropriate policies on this matter.	None
Miss Maydo Pitt	GO-East	Spatial Principles	36	O	GO-East still not fully clear how the spatial principles fit in with the rest of the Core	The spatial principles were intended to give more detail on the spatial elements contained in the vision. However, it is acknowledged by the Council that the	Submission plan revised to incorporate elements of the spatial principles in the vision

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Gareth Ridewood	CPRE	Spatial Principles	77	C	<p>Strategy structure. It is not clear how they relate to the preferred policies, nor why they are needed in addition to a spatial vision, objectives, core policies and the spatial strategy. A more spatially specific vision could incorporate elements of the spatial principles into the vision, thereby giving it a greater spatial focus. The remainder of the spatial principles could then be deleted from the submission document to avoid unnecessary duplication.</p> <p>Para 5.34 - amend to state that new growth is dependent on new infrastructure funding and delivery first and any growth must be within the existing environmental capacity of the District</p> <p>Para 5.35 remove word 'significant' - the area mentioned - would not be able to accommodate significant growth without compromising sustainable growth policies.</p> <p>5.36 reword to ensure that any development does not by its bulk or</p>	<p>relationship between the vision, principles and objectives is not clear. Consideration has been given as to how to make this clearer.</p>	<p>to provide the spatial specificity and local distinctiveness required.</p>
					<p>Para 5.34 - amend to state that new growth is dependent on new infrastructure funding and delivery first and any growth must be within the existing environmental capacity of the District</p> <p>Para 5.35 remove word 'significant' - the area mentioned - would not be able to accommodate significant growth without compromising sustainable growth policies.</p> <p>5.36 reword to ensure that any development does not by its bulk or</p>	<p>This representation raises a number of issues in relation to a number of paragraphs. The support is noted. For the other issues consideration will be given as to how best to incorporate them into the relevant paragraphs. The Core Strategy is a strategic high level document and it is not appropriate to include detailed information such as a list of buildings of local character. This could be an issue that is looked at when preparing the Development Control Policies DPD.</p>	<p>Submission plan revised to strengthen the vision. Parts of the spatial principles have been incorporated to provide spatially specific detail. The vision has been significantly strengthened to recognise the important role that heritage has within the District and sets out how this can be enhanced. The vision also recognises the potential opportunities offered by redundant airfields.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Philip Raiswell	Sport England	Spatial Principles	150	C	<p>scale have a detrimental impact on the historical core of our market towns, eroding their character and dominating the visual scene to avoid loss of character</p> <p>Buildings of historical significance such as the Old Barracks in Huntingdon, Arts and Crafts Isolation Wards on Primrose Lane Huntingdon, the George Hall which are currently under threat, should be protected.</p> <p>There needs to be a List of Buildings of Local Character.</p> <p>Para 5.42 is supported</p>	<p>The inclusion of a district wide spatial principle as identified will be considered.</p>	<p>Submission plan revised to strengthen the vision and include reference to the importance of promoting access to recreational facilities.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Miss Ellen O'Grady	Defence Estates	Spatial Principles	83	S	Defence Estates will work closely with HDC and the local community to find an appropriate scheme for the mixed use redevelopment of RAF Brampton if it becomes surplus to government requirements.	Support noted.	None needed.
Mr Steven Harvey	n/a	Spatial Principles	142	O	The 'urban concentration' approach disregards the needs of the majority of the population to live within sustainable communities in the rural areas. Should reflect Government Guidance on the need to secure the future of existing communities by enabling them to provide for their own basic needs, to overcome the need to travel across the district to the larger urban areas.	In order to maintain the strategic nature of the Core Strategy the Preferred Options specifically identify only those locations that are considered to be suitable for large scale development. The Settlement Hierarchy makes provision for appropriate scales of development in key service centres and smaller settlements. It is however not considered appropriate to specifically identify small development opportunities.	None needed.
Mr Steven Harvey	n/a	Spatial Principles	143	O	We object to the Spatial Principle (5.40) that larger towns and their Spatial Planning Areas should be the only locations that should benefit from growth.	In order to maintain the strategic nature of the Core Strategy the Preferred Options specifically identify only those locations that are considered to be suitable for large scale development. The Settlement Hierarchy makes provision for appropriate scales of development in key service centres and smaller settlements. It is however not considered appropriate to specifically identify small development opportunities.	Submission plan revised to clarify how spatial planning areas have been identified in paragraphs 5.3-5.7 (Volume 1) and Volume 2.



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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Steven Harvey	n/a	Spatial Principles	144	S	<p>We support the SA/SEA where it makes it clear that PO2 should direct development to create a critical mass of services in order to make communities more self sustaining; without new development, the majority of villages in the district will turn into unsustainable 'dormitory' settlements with no local services or facilities for older and younger people.</p>	<p>Further clarification of the reasons for designating spatial planning areas will be included in section 7.</p> <p>The SA has been integral to plan preparation and has informed production of the Core Strategy at each stage. It has helped ensure that the submission policies are sustainable makes recommendations as to how they can be improved where appropriate. The spatial strategy recognises the importance of sustaining local facilities and directs growth to this settlements which are most sustainable and also helps promote the rural economy by directing growth to key service centres. The settlement hierarchy incorporates sufficient flexibility to allow limited development in smaller settlements which will help sustain local facilities.</p> <p>In order to maintain the strategic nature of the Core Strategy the Preferred Options specifically identify only those locations that are considered to be suitable for large scale development. The Settlement Hierarchy makes provision for appropriate scales of development in key service centres and smaller settlements. It is however not considered appropriate to specifically identify small development opportunities. Many villages are already dormitory settlements and this character will not be changed or other villages becoming more dormitory in nature by simply allocating new development. In most cases this would purely be unsustainable development in increasing unsustainable locations.</p>	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Steven Harvey	n/a	Spatial Principles	145	O	Objects to the failure to address the specific issues of redundant military bases; PO2 should provide certainty about the Council's future intentions for redevelopment at these locations.	At the time of writing, the Preferred Options contained as detailed and specific information concerning the former military bases in the district. The MOD has now confirmed that RAF Brampton will close and this adds to the certainty for redevelopment. Wherever possible the Core Strategy will give as clear a picture of the future of military bases as possible.	Submission plan revised to clarify the Council's approach to re-using redundant airfields in the vision and volume 2.
Mr Steven Harvey	n/a	Spatial Principles	149	O	Fails to acknowledge the requirements of PPS25 to prevent development within flood plain areas, to reflect the key objectives of both the emerging East of England Plan and the emerging Huntingdonshire Sustainable Community Strategy Vision, 2007 or to take into account the PPS1 Climate Change supplement.	The Core Strategy Preferred Options were published after the PPS1 climate change supplement. Although the draft was available and was taken into account it was considered prudent to limit the consideration of the draft as the final version could have changed substantially as has been seen with other PPS documents in recent years. The Sustainable Community Strategy was also under preparation at the same time as the Core Strategy Preferred Options. The two documents had regard to each other during preparation. Regard has been had to PPS25 particularly in St Ives where a number of development locations have been ruled out because of flood risk. The representation claims that these documents were not taken into account but fails to identify areas that could be improved or where changes should be made. More explicit reference will be	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Tom Gilbert-Wooldridge	English Heritage	Spatial Principles	116	O	<p>English Heritage considers this should include an explicit reference to the historic environment (or the environment generally).</p> <p>Amend Paragraph 5.42 from "the landscape and countryside of Huntingdonshire" to "the natural, historic and built environments of Huntingdonshire".</p> <p>The following sentences in this paragraph then need to refer to the historic and built environment and how this will be conserved and enhanced.</p>	<p>made to all of these documents where appropriate, however without the identification of areas for improvement no changes are proposed.</p> <p>Suggested changes are accepted. Consideration has been given as to how best to incorporate additional wording.</p>	<p>Submission plan revised to strengthen the vision and include additional reference to the historic environment. The suggested wording has been incorporated into the vision.</p>
Tom Gilbert-Wooldridge	English Heritage	Spatial Principles	117	C	<p>English Heritage considers that as military bases become redundant appraisals will be carried out of their historic interest and that the information will be used to shape future development proposals. Upwood and Wyton especially important. Amend para 5.44 to this effect.</p>	<p>It is not appropriate for the Core Strategy to consider site specific issues. This will be dealt with in subsequent DPDs.</p>	<p>None needed.</p>
Miss Rachel Pateman	Wildlife Trust	Spatial Principles	267	C	<p>Para 5.34 should state that growth does not exceed the</p>	<p>The vision covers the need to protect the environment adequately and it is therefore implicit that environmental</p>	

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
					<p>environmental capacity of the district. Seeks the addition of another key enhancement area - the woodland to the south of the district (including Waresley &amp; Gransden Wood, Sand Wood and Weaveley Wood) which form part of a wider "Forest of South Cambridgeshire"</p> <p>Para 5.42 should recognise that transport networks should consider impacts on ecological networks. Paragraph 5.43 should state that redevelopment of military bases will maximise all aspects of sustainable development.</p>	<p>capacity with be taken into account. The information contained in para 5.42 is not intended to be an exhaustive list as demonstrated by the prefix "include." Further detail on all those areas identified for enhancement is given in the relevant policy. It is not considered appropriate to include such detail suggested by the consultee regarding transport and ecological networks within the vision. Para 5.43 does not refer to redevelopment of military bases.</p>	
Mr David Reavell	O&H Properties	Spatial Principles	217	O	<p>Fails to recognise the contribution can be made to the growth opportunities in the north of the district, relating to and supporting Peterborough's growth.</p> <p>Huntingdonshire is a key part of the Government's Growth Area and there is a need to work jointly with Peterborough City Council to develop a long term growth strategy.</p>	<p>The Council recognises the important contribution that the northern part of the District offers for growth and for promoting biodiversity and green infrastructure and PCC is always consulted. However, as set out in the East of England Plan growth should follow the hierarchy in CSR1 which states that, following a preference for growth in and on the periphery of Cambridge and in Northstowe, growth should be accommodated in the market towns of the sub-region. The spatial strategy does recognise the opportunities in Yaxley, but also acknowledges the high levels of growth</p>	<p>Submission plan revised to strengthen the vision and include reference to the relationship that the northern part of the District has with Peterborough and the role it plays in being an important green resource for the expected population growth.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Stamford Homes (Midlands) Ltd	Stamford Homes (Midlands) Ltd	Spatial Principles	263	S	Support - growth should be directed towards the market towns and such an approach is in conformity with the RSS.	Support noted.	None needed.
Stamford Homes (Midlands) Ltd	Stamford Homes (Midlands) Ltd	Spatial Principles	257	S	Support overall principle of spatial principles, including a more restricted approach to growth in smaller settlements subject to appropriate flexibility.	Support noted.	Submission plan revised to strengthen the vision by incorporating elements of the principles. The aspiration to restrict growth where appropriate in smaller settlements has been retained and additional flexibility has been added to policy CS3 the Settlement Hierarchy
Ms Diane Millis	Woodland Trust	Spatial Principles	177	C	The Woodland Trust seeks to amend para 5.34 to refer to the need to ensure future growth in the Cambridge sub-region will not be at the expense of areas or features of high biodiversity value, such as ancient woodland and ancient trees. The Spatial Principles should contain a reference to climate change in line with recommendations in the recently published	Reference to climate change has been adequately covered by the addition of an extra objectives relating to climate change and the reasoned justification of CS1.	Submission plan revised to strengthen the vision by incorporating elements of the spatial principles. The protection of areas with high landscape value is made explicit.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Bewick Homes	Bewick Homes	Spatial Principles	254	S	Support overall principle of spatial principles, including a more restricted approach to growth in smaller settlements subject to appropriate flexibility.	Support noted.	None needed.
Mr Tim Fryer	Brampton PC	Spatial Principles	318	C	At para 5.35 Brampton PC suggest listing the 'industrial area west of Huntingdon town centre' before 'RAF Brampton'. (Note that in 7.3 the areas are listed Huntingdon first.)	The vision will be strengthened by incorporating elements of the spatial principles.	Submission plan revised to strengthen vision by incorporating elements of the spatial principles. The vision clearly sets out the Council's approach to the potential re-use of all redundant airfields, not just RAF Brampton.
Mr Tim Fryer	Brampton PC	Spatial Principles	321	C	At para 5.42 Brampton PC suggests including Hinchinbrooke Country Park especially if the Huntingdon West AAP recommends further development as greenspace.	The vision sets out the Council's aspirations for the future development of the District and will be strengthened by incorporating elements of the spatial principles, including para 5.35. However, this paragraph only lists some of those areas identified for Strategic Greenspace Enhancement, the identification of which, has been informed by the Cambridgeshire Green Infrastructure Strategy. Hinchinbrooke Country Park is not one of these areas. Further detail on the particular issue highlighted by the consultee will be dealt with in the AAP.	Submission plan revised to strengthen the vision by incorporating elements of the spatial principles.
Mr Tim Fryer	Brampton PC	Spatial Principles	322	O	At para 5.43 Brampton PC has significant concerns that the removal of the A14	The Spatial Vision and Principles are specifically worded to identify aspirational targets that are considered to be achievable. Further information	Submission plan revised to strengthen the implementation and infrastructure chapter to

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Paul Seabrook	Seabrook Farms	Spatial Principles	628	O	<p>viaduct and the proposed changes to the Huntingdon area road network will provide little or no benefit and may well make traffic flow much worse..</p> <p>The objective regarding "growth in key service centres to sustain existing services and facilities" previously in Options &amp; Issues has not been carried forward into the Preferred for reasons which are not explained. This objective is a sensible and appropriate objective in accordance with sustainable principles. Focussing growth in the large towns and "spatial planning areas" will result in the decline of services in key service centres, and in order to sustain such facilities a proportionate amount of growth should be distributed amongst all of these settlements.</p>	<p>on the implications of A14 improvements will be given in the Infrastructure and Implementation chapter.</p> <p>It is not clear which part of the Spatial Principles previously identified in Towards a Spatial Strategy the consultee is referring to as the wording is virtually unchanged.</p>	<p>give more information on the impacts of the A14 improvements.</p> <p>Submission plan revised to strengthen the vision by incorporating elements of the spatial principles. The aspiration to facilitate appropriate levels of growth in key service centres has been retained.</p>
Gates Hydraulics	Gates Hydraulics	Spatial Principles	486	S	<p>Supports para 5.34 that future growth should take place within Huntingdon, St Neots and St Ives where there is access to existing and improving public</p>	<p>Support noted.</p>	<p>Submission plan revised to strengthen the vision by incorporating some of the spatial principles. The aspiration to regenerate certain</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
					transport, new road infrastructure and where the use of amenities and facilities can be maximised as this is sustainable. Also supports para 5.37 which seeks to regenerate run down areas.		areas is recognised and made explicit throughout the document such as in the spatial portrait .
Marlborough Developments Ltd	Marlborough Developments Ltd	Spatial Principles	522	O	<p>Fails to recognise the contribution can be made to the growth opportunities in the north of the district, relating to and supporting Peterborough's growth.</p> <p>Huntingdonshire is a key part of the Government's Growth Area and there is a need to work jointly with Peterborough City Council to develop a long term growth strategy.</p> <p>Land to the north and north west of Yaxley presents an alternative sustainable location for growth.</p>	<p>The Council recognises the important contribution that the northern part of the District offers for growth and for promoting biodiversity and green infrastructure and PCC is always consulted. However, as set out in the East of England Plan growth should follow the hierarchy in CSR1 which states that, following a preference for growth in and on the periphery of Cambridge and in Northstowe, growth should be accommodated in the market towns of the sub-region. The spatial strategy does recognise the opportunities in Yaxley, but also acknowledges the high levels of growth it has accommodated in recent years. This should be reflected more clearly in the vision</p>	<p>Submission plan revised to strengthen the vision and include reference to the relationship that the northern part of the District has with Peterborough and the role it plays in being an important green resource for the expected population growth.</p>
Mr M Hankins	n/a	Spatial Principles	607	S		Support noted.	None needed.
Milton (Peterborough) Estates Ltd	Milton (Peterborough) Estates Ltd	5.34	171	S	Support overall principle of spatial principles, including a more restricted approach to growth in	Support noted.	None needed.



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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Churchmanor Estates Company Plc	Churchmanor Estates Company Plc	5.34	247	S	Support the identification of Huntingdon as having capacity to accommodate additional growth.	Support noted.	None needed.
Mr Matthew Stock	Redrow Homes	5.34	284	S	The Spatial Principles are supported in principle as it recognises that the most sustainable locations are the three market towns where existing and proposed infrastructure will support further growth.	Support noted.	None needed.
Ewen McLeod for Wrenbridge Land Ltd	Wrenbridge Land Ltd	5.34	265	C	Two additional objectives should be added: <ul style="list-style-type: none"> <li>To make best use of existing infrastructure and committed improvements to existing infrastructure, such as strategic road improvements;</li> <li>To provide for development in business sectors with very specific locational requirements that need to be located within the district, such as storage and distribution related to the strategic road network.</li> </ul>	The objectives will be revised for submission however, the suggestions are considered too detailed for the Core Strategy.	Submission plan revised to include additional objectives including one on prioritise brownfield land. The criteria relating to making best use of existing infrastructure has been expanded in policy CS1.
Lord De Ramsey	Ramsey Estates	5.34	429	O	Ramsey has effectively been overlooked by the spatial principles with	Despite Ramsey's designation as a Market Town it is acknowledged that the transport infrastructure is not	Submission plan revised to clarify why Ramsey is less

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
H Raby & Sons	H Raby & Sons	5.34	377	S	no specific reference to any vision for the growth beyond regeneration and retail objectives despite Ramsey being the District's fourth market town and therefore the next most sustainable location for development. It is also inconsistent with the way other settlements are dealt with in terms of market towns at paragraph 5.34 and key service centres and smaller settlements at paragraph 5.40.	adequate to support significant development. The levels proposed for Ramsey are considered sufficient to help regenerate the area and begin to improve infrastructure provision. The reasons why Ramsey is less sustainable than other market towns will be clarified for submission.	sustainable than other market towns in paragraph 5.7
H Raby & Sons	H Raby & Sons	5.34	377	S	Supports the overall spatial principles, especially in paragraph 5.34 with the majority of growth directed to the market towns of Huntingdon, St Neots and St Ives being the most sustainable and well serviced locations for expansion. This is in accordance with both the emerging Regional Spatial Strategy and the adopted Cambridgeshire and Peterborough Structure Plan 2003.	Support noted.	None needed.
Connolly Homes Plc, David Wilson Es	Connolly Homes Plc, David Wilson Estates	5.34	440	S	We support the spatial objectives, in particular the desire to enable specialist housing needs to be met in appropriate locations.	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
D R Juggins	n/a	5.34	387	S	Supports the overall spatial principles, especially in paragraph 5.34 with the majority of growth directed to the market towns of Huntingdon, St Neots and St Ives being the most sustainable and well serviced locations for expansion. This is in accordance with both the emerging Regional Spatial Strategy and the adopted Cambridgeshire and Peterborough Structure Plan 2003.	Support noted.	None needed.
Lenton Trustees (L019)	Lenton Trustees	5.34	405	S	Supports the overall spatial principles, especially in paragraph 5.34 with the majority of growth directed to the market towns of Huntingdon, St Neots and St Ives being the most sustainable and well serviced locations for expansion. This is in accordance with both the emerging Regional Spatial Strategy and the adopted Cambridgeshire and Peterborough Structure Plan 2003.	Support noted.	None needed.
Bank Trustees	Bank Trustees	5.34	462	S	Supports the overall spatial principles, especially in paragraph 5.34 with the majority of growth directed to the market towns of Huntingdon, St Neots	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr T Smith	n/a	5.34	368	S	and St Ives being the most sustainable and well serviced locations for expansion. This is in accordance with both the emerging Regional Spatial Strategy and the adopted Cambridgeshire and Peterborough Structure Plan 2003. Supports the overall spatial principles, especially in paragraph 5.34 with the majority of growth directed to the market towns of Huntingdon, St Neots and St Ives being the most sustainable and well serviced locations for expansion. This is in accordance with both the emerging Regional Spatial Strategy and the adopted Cambridgeshire and Peterborough Structure Plan 2003.	Support noted.	None needed.
William Evans	WharfLand Investments	5.34	386	O	Wharf objects to the dispersed growth pattern and the market town expansion suggested at St Neots, St Ives and Ramsey and the level of development proposed at the key service centres, namely, Godmanchester (within the Huntingdon area), Fenstanton and Sawtry.	Objection is raised to most of the large scale locations identified, largely on the basis that there is insufficient existing infrastructure but suggests a new settlement as the solution, where there is no infrastructure, which is acknowledged in the representation. Also Eco Towns are separate from district housing requirements so would not replace delivery in the Core Strategy. A significant factor in the discounting of new settlement options previously considered by the Council was two fold;	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Strawsons Devt t/a Omnivale	Strawsons Devt t/a Omnivale	5.34	550	C	<p>Proposes the market town growth strategy is replaced with strategic development at a new Spatial Planning Area known as Conington Spatial Planning Area which would accommodate a sustainable mix of residential and commercial uses in the form of a new community or a new settlement, possibly in the form of a new EcoTown. This could be in the form of a "linked settlement" growth pattern between Peterborough, Conington (a brownfield and or mixed brownfield and greenfield strategic development area) and Huntingdon. It would logically link to development growth already identified to the west of Huntingdon.</p> <p>At para 5.34 add 'Some growth but on a smaller scale than the other three market towns will take place at Ramsey and Bury in order to facilitate regeneration.' At para 5.44 add 'The former RAF Upwood also offers the opportunity for mixed use development on an</p>	<p>firstly the lead in time would be considerable with the implementation of significant new infrastructure and could not be accurately predicted; secondly the requirements from PPS3 for a 5 year land supply could not be reliably maintained due to uncertainty of the lead in time and few sites coming forward for delivery in the medium term because of the lack of additional locations.</p>	<p>Submission plan revised to clarify development strategy for Ramsey and Bury in para 5.7 and explanation of the council's approach to redundant airfields in the vision.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Adam Ireland	Environment Agency	5.34	534	S	Support the spatial principle of the location of the majority of future development in and around the existing larger towns of Huntingdon, St Ives and St Neots	Support noted.	None needed.
Edwards	n/a	5.34	490	O	Supports the majority of development being directed to the market towns of Huntingdon, St Neots and St Ives as the most sustainable and well serviced locations for expansion. However, considers that Ramsey has effectively been overlooked by the spatial principles, despite being the District's fourth market town and the next most sustainable location..	Ramsey has fewer facilities and is in a less sustainable location than the other market towns and therefore is considered that the scale of growth proposed is appropriately lower	Submission plan revised to strengthen vision and incorporate elements of the spatial principles. The role that Ramsey and Bury has in accommodating growth (and its constraints) is made clear in the spatial portrait and policy CS2.
Huntingdon Water Tower Ltd	Huntingdon Water Tower Ltd	5.34	615	S	Huntingdon Water Tower Ltd support the proposals to focus employment development in the market towns. It also supports proposals to secure high quality employment sites of strategic importance in sustainable locations.	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr T Smith	n/a	5.34	649	S	Particular support is given to proposals for the Huntingdon West Action Area and Western Gateway to the town. This should be a location for buildings of innovative design at this important entrance both to the town centre and Hinchbrook. Supports the overall spatial principles, especially in paragraph 5.34 with the majority of growth directed to the market towns of Huntingdon, St Neots and St Ives being the most sustainable and well serviced locations for expansion. This is in accordance with both the emerging Regional Spatial Strategy and the adopted Cambridgeshire and Peterborough Structure Plan 2003.	Support noted.	None needed
Lenton Trustees (L019)	Lenton Trustees	5.35	406	S	Supports the redevelopment of previously developed land including RAF Brampton and the industrial area to the west of Huntingdon. This is consistent with PPS3, the emerging Regional Spatial Strategy and the adopted	Support noted.	None needed

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Chief Engineer	Middle Level Commissioners	5.37	372	C	The Middle Level Commissioners suggest that the provision of a turning bay for narrow boats as part of the Ramsey Gateway development may assist in increasing tourism in the area and thus aiding the local economy.	While tourism and economic regeneration are considered to be particularly important for the district and for Ramsey the detail proposed is considered to be too specific for the Core Strategy.	None.
Churchmanor Estates Company Plc	Churchmanor Estates Company Plc	5.38	248	O	Challenge the proposal to provide additional retail development to the west of Huntingdon Town Centre. There is no proven need for such expansion and whilst spare capacity in the centre remains this should be the focus for development.	The Core Strategy covers a long plan period and in order to plan effectively for at least 9000sqm of comparison floorspace in Huntingdon a long term view must be taken. Additional text should be added to 5.38 to clarify the town centre first approach, however to achieve the development it is considered that land outside of the town centre will be required this is made clear in the Retail Assessment Study which provides robust evidence base underpinning the policy. The Council will make clear the priority attached to development sites within town centres	Submission plan revised to make clear the sequential approach the Council has taken to retail development and emphasise the priority attached to town centre sites in the reasoned justification for retail development.
Sainsburys Supermarkets Ltd	Sainsburys Supermarkets Ltd	5.38	421	S	Supports for the provision of retail growth within the Huntingdon town centre and complementary development to the west of the town centre through the Huntingdon West Area Action Plan, on the basis that growth is focussed in the George Street/Ermine Street area. Also	Support noted.	None needed.



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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Stanton Group Developments Ltd	Stanton Group Developments Ltd	5.38	437	S	Supports the large proportion of future retail growth which to be accommodated in Huntingdon town centre, particularly the area covered by the Huntingdon West AAP, which are the areas identified within the current Retail Study as being most suitable to accommodate the projected floorspace requirements.	Support noted.	None needed.
Mr C Behagg	n/a	5.39	435	O	Objects to employment development being mostly located in the most sustainable market towns. Increased provision should be made in and adjacent to the Key Service Centres beyond the Spatial Planning Areas in order that the rural economy is supported and diversified	Small scale development for employment in KSC and villages would not be on a strategic scale. The Development Control Policies DPD will consider appropriate policies for this matter.	None needed.
H Raby & Sons	H Raby & Sons	5.39	378	S	Supports employment development being mostly located in the most sustainable market towns, commensurate with the housing growth to enable balanced communities to result. Expanding local employment will reduce	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Bank Trustees	Bank Trustees	5.39	463	S	levels of out commuting to London, Peterborough and Cambridge and ensure the continued success of the local economy. This is in line with PPG13 and the emerging Regional Spatial Strategy and the Cambridgeshire and Peterborough Structure Plan 2003.  Supports employment development being mostly located in the most sustainable market towns, commensurate with the housing growth to enable balanced communities to result. Expanding local employment will reduce levels of out commuting to London, Peterborough and Cambridge and ensure the continued success of the local economy. This is in line with PPG13 and the emerging Regional Spatial Strategy and the Cambridgeshire and Peterborough Structure Plan 2003.	Support noted.	None needed.
Mr T Smith	n/a	5.39	370	S	Supports employment development being mostly located in the most sustainable market towns, commensurate with the	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Huntingdon Water Tower Ltd	Huntingdon Water Tower Ltd	5.39	614	S	<p>housing growth to enable balanced communities to result. Expanding local employment will reduce levels of out commuting to London, Peterborough and Cambridge and ensure the continued success of the local economy. This is in line with PPG13 and the emerging Regional Spatial Strategy and the Cambridgeshire and Peterborough Structure Plan 2003.</p>	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
FLP	FLP (agent)	5.40	275	O	Our client objects to the notion that development in the Key Service Centres should be restricted.	While it is considered important to maintain the strategic nature of the Core Strategy such that it is considered to be inappropriate to make specific reference to small scale development opportunities that will characterise the Key Service Centres. The Settlement Hierarchy allows appropriate scales of development in KSC. It would not be sustainable to locate major growth in these locations. The aspiration to promoted limited development in appropriate key service centres in order to sustain the local economy and facilities will be made clear in the vision and spatial strategy.	Submission plan revised to clarify the Council's approach to development in Key Service Centres in the vision and spatial strategy.
Mr C Dodson	n/a	5.40	411	O	Objects to the growth proposals for Key Service Centres outside of the Spatial Planning Areas as this is unduly restrictive towards well performing housing sites. Whilst growth at Key Service Centres may be less sustainable than at the market towns, a modest level of growth is considered appropriate in order that the rural economy may be underpinned and existing services and facilities supported. This would be consistent with PPS 7 and is especially relevant where Key Service Centres possess a sufficiently wide range of day to day services and	It is considered important to maintain the strategic nature of the Core Strategy such that it is considered to be inappropriate to make specific reference to small scale development opportunities that will characterise the Key Service Centres. The aspiration to promote limited development in appropriate key service centres in order to sustain the local economy and facilities will be made clear in the vision and spatial strategy.	Submission plan revised to clarify the Council's approach to development in Key Service Centres in the vision and spatial strategy.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mrs Warnes	n/a	5.40	419	O	<p>facilities to minimise the need to travel as at Somersham.</p> <p>Objects to the growth proposals for Key Service Centres outside of the Spatial Planning Areas as this is unduly restrictive towards well performing housing sites. Whilst growth at Key Service Centres may be less sustainable than at the market towns, a modest level of growth is considered appropriate in order that the rural economy may be underpinned and existing services and facilities supported. This is especially relevant where Key Service Centres possess a sufficiently wide range of day to day services and facilities to minimise the need to travel as at Yaxley.</p>	<p>It is considered important to maintain the strategic nature of the Core Strategy such that it is considered to be inappropriate to make specific reference to small scale development opportunities that will characterise the Key Service Centres. The aspiration to promote limited development in appropriate key service centres in order to sustain the local economy and facilities will be made clear in the vision and spatial strategy.</p>	<p>Submission plan revised to clarify the Council's approach to development in Key Service Centres in the vision and spatial strategy.</p>
Mr J Stokes	n/a	5.40	451	O	<p>Objects to the growth proposals for Key Service Centres outside of the Spatial Planning Areas as this is unduly restrictive towards well performing housing sites. Whilst growth at Key Service Centres may be less sustainable than at the market towns, a modest</p>	<p>It is considered important to maintain the strategic nature of the Core Strategy such that it is considered to be inappropriate to make specific reference to small scale development opportunities that will characterise the Key Service Centres. The aspiration to promote limited development in appropriate key service centres in order to sustain the local economy and facilities will be made clear in the vision and spatial strategy.</p>	<p>Submission plan revised to clarify the Council's approach to development in Key Service Centres in the vision and spatial strategy.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mrs J Daniels	n/a	5.40	504	O	<p>level of growth is considered appropriate in order that the rural economy may be underpinned and existing services and facilities supported. This is especially relevant where Key Service Centres possess a sufficiently wide range of day to day services and facilities to minimise the need to travel as at Warboys.</p> <p>Objects to the growth proposals for Key Service Centres outside of the Spatial Planning Areas as this is unduly restrictive towards well performing housing sites. Whilst growth at Key Service Centres may be less sustainable than at the market towns, a modest level of growth is considered appropriate in order that the rural economy may be underpinned and existing services and facilities supported. This is especially relevant where Key Service Centres possess a sufficiently wide range of day to day services and facilities to minimise the need to travel as at Warboys.</p>	<p>The settlement strategy allows for appropriate scales of growth in KSC.</p> <p>It is considered important to maintain the strategic nature of the Core Strategy such that it is considered to be inappropriate to make specific reference to small scale development opportunities that will characterise the Key Service Centres. The aspiration to promoted limited development in appropriate key service centres in order to sustain the local economy and facilities will be made clear in the vision and spatial strategy.</p> <p>The settlement strategy allows for appropriate scales of growth in KSC.</p>	<p>Submission plan revised to clarify the Council's approach to development in Key Service Centres in the vision and spatial strategy.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Persimmon Homes	Persimmon Homes	5.40	544	O	Suggest the last sentence should include "In smaller settlements proposals for future housing will be assessed on the basis of their accessibility to facilities, proximity to towns and extent to which they will meet local housing need."	Suggested wording is acceptable and will be incorporated where appropriate.	Submission plan revised to strengthen the vision. The aspiration behind the suggested wording incorporated into CS3.
Mr Burgess	n/a	5.40	513	O	Objects to the growth proposals for Key Service Centres outside of the Spatial Planning Areas as this is unduly restrictive towards well performing housing sites. Whilst growth at Key Service Centres may be less sustainable than at the market towns, a modest level of growth is considered appropriate in order that the rural economy may be underpinned and existing services and facilities supported. This is especially relevant where Key Service Centres possess a sufficiently wide range of day to day services and facilities to minimise the need to travel as at Yaxley.	It is considered important to maintain the strategic nature of the Core Strategy such that it is considered to be inappropriate to make specific reference to small scale development opportunities that will characterise the Key Service Centres. The aspiration to promoted limited development in appropriate key service centres in order to sustain the local economy and facilities will be made clear in the vision and spatial strategy.  The settlement strategy allows for appropriate scales of growth in KSC.	Submission plan revised to clarify the Council's approach to development in Key Service Centres in the vision and spatial strategy.
Property & Procurement	Cambs CC Property & Procurement	5.40	519	O	Objects to the growth proposals for Key Service Centres outside	It is considered important to maintain the strategic nature of the Core Strategy such that it is considered to	Submission plan revised to clarify the Council's approach to

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr S Ross	n/a	5.41	100	C	<p>of the Spatial Planning Areas as this is unduly restrictive towards well performing housing sites. Whilst growth at Key Service Centres may be less sustainable than at the market towns, a modest level of growth is considered appropriate in order that the rural economy may be underpinned and existing services and facilities supported. This is especially relevant where Key Service Centres possess a sufficiently wide range of day to day services and facilities to minimise the need to travel as at Yaxley.</p> <p>It should be recognised that Yaxley benefits from its close physical and functional relationship with Peterborough the Hamptons and that further development can be readily accommodated to the south west of Yaxley without jeopardising its separate identity.</p>	<p>be inappropriate to make specific reference to small scale development opportunities that will characterise the Key Service Centres. The aspiration to promoted limited development in appropriate key service centres in order to sustain the local economy and facilities will be made clear in the vision and spatial strategy.</p> <p>The settlement strategy allows for appropriate scales of growth in KSC.</p>	<p>development in Key Service Centres in the vision and spatial strategy.</p> <p>Submission plan revised to strengthen the vision by incorporating elements of the spatial principles. The vision now reflects the relationship between the north of the District and Peterborough.</p>
Mr Justin Tilley	Natural England	5.41	311	S	<p>Support and welcome the recognition of the important role greenspace provision and function should</p>	<p>Support noted.</p>	<p>None needed.</p>



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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Justin Tilley	Natural England	5.42	312	S	play in cross-boundary arrangements for the expansion of Peterborough Support the intention to protect and enhance the countryside but consider that the protection and enhancement of biodiversity should also be specifically mentioned as a principle.	Support noted. The protection and enhancement of biodiversity is adequately covered within the vision and elsewhere in the Core Strategy, namely CS1 and CS9.	None needed.
Chief Engineer	Middle Level Commissioners	5.42	374	C	The Middle Level Commissioners comment that when promoting the district's biodiversity care should be taken to ensure that the non-IDB maintained local land drainage/flood defence systems are not detrimentally affected. There are also issues that need to be addressed in relation to the long-term maintenance of such sites.	Comments noted. To maintain the strategic nature of the Core Strategy it is considered to be overly specific to make specific reference in the Spatial Principles to the land drainage/flood defences as detailed in this representation.	None needed.
Taylor Woodrow Developments Ltd	Taylor Woodrow Developments Ltd	5.43	644	O	Agree that the A14 improvements will create significant opportunities for development and growth in the Huntingdon area.	While it is acknowledged that a number of elements of the strategy will be dependent to some degree on the implementation of a small number of major infrastructure projects including the improvements to the A14 it is considered that there will be sufficient flexibility in the Strategy for delivery to be maintained if infrastructure provision is delayed.	Submission plan revised to strengthen the Implementation and Infrastructure chapter.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
					<p>However, concerned whether there is understanding of the extent to which development could proceed in advance of, or in absence of, the strategic highway infrastructure. Local Development Frameworks: Lessons Learnt Examining Development Plan Documents - Planning Inspectorate 2007 stresses that :</p> <ul style="list-style-type: none"> <li>- DPDs should be firmly focused on delivery and thus the implementation and monitoring sections are of equal importance as the policies themselves</li> <li>Implementation and delivery targets must be clear and related to policy.</li> <li>- Flexibility is also about considering "what if" scenarios, eg if the strategy is heavily reliant on a specific type of infrastructure or a major site.</li> <li>- The plan should address the issues that could arise if the chosen option cannot be delivered when required.'</li> </ul>	<p>Reference will be made to the implications of infrastructure delivery on delivery of the Core Strategy in the Infrastructure and Implementation chapter.</p>	

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Huntingdon Water Tower Ltd	Huntingdon Water Tower Ltd	5.43	612	S	<p>The preferred options do not appear to be founded upon any rational or objective assessment of the timing of infrastructure delivery so it cannot set out alternative options if the major infrastructure works do not finally proceed, or are delayed further in their implementation. The Core Strategy needs to be founded on a clear documented understanding of infrastructure provision (PSS12 Annex B3-B5) and contingencies are needed to deal with the circumstances of delay in order to meet test ix.</p>		
Huntingdon Water Tower Ltd	Huntingdon Water Tower Ltd	5.43	612	S	<p>Huntingdon Water Tower Ltd support the proposals to focus employment development in the market towns. It also supports proposals to secure high quality employment sites of strategic importance in sustainable locations. Particular support is given to proposals for the Huntingdon West Action Area and Western Gateway to the town and improvements to the A14.</p>	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mrs Lorraine Russell	Ramsey TC	5.44	105	C	<p>This should be a location for buildings of innovative design at this important entrance both to the town centre and Hinchbrook.</p> <p>Should include reference to a mixed use development on the redundant RAF Upwood site which would help justify the inclusion of Ramsey and Bury as a Market Town.</p>	<p>The vision will be revised for submission to clarify the Council's approach to all redundant airfields. The Core Strategy is not intended to identify specific sites only broad directions for growth which are clearly identified in the key diagram. The designation of Ramsey as a market town does not need to be justified as it is a saved policy from the Local Plan Alteration 2002.</p>	None needed.
Mr Chris Blackman	Cambs CC	5.44	471	C	<p>Support the view that the future of Alconbury and Wyton Airfields and other strategic development options will be a matter for consideration as part of the next review of the Regional Spatial Strategy due to start shortly. Alconbury is designated as a strategic employment site in the Saved Policies of the Structure Plan.</p>	<p>Comments and support noted.</p>	None needed.
Mr Roy Reeves	Warboys PC	5.44	634	O	<p>The Parish Council does not support the residential development of RAF Wyton; the land should be returned to agricultural use once the airfield is no longer used for military purposes.</p>	<p>The future redevelopment of redundant airfields such as Wyton is an issue of regional importance which will await the RSS review.</p>	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Marlborough Developments Ltd	Marlborough Developments Ltd		524	C	The purpose of the Objectives and their relationship to the Spatial Principles is not made clear in the Core Strategy. Logically, the objectives should be the first part of translating the vision into policy, prior to the setting out of Spatial Principles, which should then indicate how these will achieve the Core Strategy objectives.	The purpose of the Principles and the Objectives is clearly explained in paragraphs 5.33 and 5.45 respectively. Elements of the spatial principles will be incorporated into the vision in order to add clarification.	Submission plan revised to strengthen the vision.
Mr David Reavell	O&H Properties	5.45	201	C	The purpose of the Objectives and their relationship to the Spatial Principles is not made clear in the Core Strategy. Logically, the objectives should be the first part of translating the vision into policy, prior to the setting out of Spatial Principles, which should then indicate how these will achieve the Core Strategy objectives.	Clarification of the role of the Spatial Principles and the Objectives will be made by incorporating elements of the spatial principles into the vision.	Submission plan revised to strengthen the vision and incorporate elements of the spatial principles.
Martin Leyland	Barratt Strategic	5.45	221	C	The purpose of the Objectives and their relationship to the Spatial Principles is not made clear in the Core Strategy. Logically, the objectives should be the first part of translating the vision into policy, prior to the setting out of Spatial	Clarification of the role of the Spatial Principles and the Objectives will be made by incorporating elements of the spatial principles into the vision.	Submission plan revised to strengthen the vision and incorporate elements of the spatial principles.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Geoff Keeble	Environment Agency	Objectives	56	S	Principles, which should then indicate how these will achieve the Core Strategy objectives.  The spatial objectives relevant to the HA are the same as those put forward in HDC's 'Towards a Spatial Strategy for Huntingdonshire' options paper reviewed on behalf of the HA in September 2007, and should support development to proceed in a sustainable manner.	Support noted.	None needed.
Mr Gareth Ridewood	CPRE	Objectives	78	S	Support but at 2. add 'significant' before proportion.	Suggestion is not accepted. It is considered that 'significant' would suggest more than the 40% sought in policy CS4.	None needed.
Mr Philip Raiswell	Sport England	Objectives	154	S	Welcome objective 14.	Support noted.	None needed
Mr Steven Harvey	n/a	Objectives	153	S	Support the reference at 6 to a 'scale which helps to provide local jobs and limit commuting'. The Core Strategy should be made consistent with this objective and the phrase 'limited' elsewhere in PO2 should be omitted to encourage new development that supports the rural	Support noted. References to limited development in rural areas elsewhere in the Core Strategy are considered to be appropriate. Objective 7 is implicit in applying to the whole district, therefore no change is required.	None needed

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Steven Harvey	n/a	Objectives	151	O	<p>economy and makes provision for community needs. We support Objective 7 provided that it also refers specifically to rural areas;</p> <p>Objects to Objective 1, as the urban concentration policies will not allow local needs to be addressed within the rural areas; Objects to Objective 3 as specialist housing needs should be addressed where the need arises, that is within the rural settlements that generate those needs; Objects to Objective 13 as it does not place sufficient emphasis on the need for sequential testing in line with PPS25 to prevent development in flood risk areas. Objects to Objective 15 as it does not place sufficient emphasis on the need for sequential testing in line with PPS25 to prevent development in flood risk areas.</p>	<p>Objective 1 does not rule out appropriate development in rural areas. Objective 3 is considered appropriate because it will not always be appropriate or desirable to meet specialist housing needs where they arise. Objective 13 covers a number of elements connected with risks to health. It is not considered appropriate to cover one element in specific detail. Objective 15 covers the provision of land and infrastructure. It is not considered appropriate to cover one element in specific detail. Flood risk and reference to PPS25 will be clarified elsewhere.</p>	None needed
Tom Gilbert-Wooldridge	English Heritage	Objectives	118	O	<p>As with the spatial vision and principles, the objectives lack specific reference to the conservation and enhancement of the</p>	<p>Suggestion not accepted. Objective 8 clearly sets out to maintain, enhance and conserve the landscape and historic built environment.</p>	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Tom Gilbert-Wooldridge	English Heritage	Objectives	119	S	historic environment. Reference to this would tally with Sustainability Appraisal Objective 4 in the Scoping Report. Supports Objective 11 on design, but suggest that the wording "is of high quality" is inserted between "development" and "integrates" to strengthen it.	Suggestion accepted.	Submission plan revised to alter objective 11 as suggested.
Mr Justin Tilley	Natural England	Objectives	313	S	Support especially objectives 8,9, 12 & 14	Support noted.	None needed.
Churchmanor Estates Company Plc	Churchmanor Estates Company Plc	Objectives	249	S	Support, particularly objectives 1 and 5.	Support noted.	None needed.
Miss Rachel Pateman	The Theatres Trust	Objectives	268	S	Supports the inclusion of objectives relating to habitat conservation and enhancement; provision of accessible greenspace for residents; and reduction of greenhouse gas emissions (points 8, 9, 12 and 14).	Support noted.	None needed.
Mr Matthew Stock	Redrow Homes (South Midlands) Ltd	Objectives	283	O	Reference should be made to making best use of existing infrastructure	Suggestion will be incorporated where appropriate in the submission version.	Submission plan revised to incorporate suggestion into objective 15 and policy CS1
Ian Burns	Cambs PCT	Objectives	174	S	Support Objectives 2 & 3 and that objective include the need to ensure that the types of dwellings built are suited to the requirements of the local population, as well	Support noted. The Core Strategy has been developed in close consultation with the Cambridgeshire PCT and the submission version responds to a number of issues raised (see subsequent representations). Any requirements for additional facilities will be taken into account. The Joint	Further work with the PCT will be required for subsequent DPDs.



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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Ian Burns	Cams PCT	Objectives	175	C	<p>as enable specialist housing needs of particular groups to be met in appropriate locations. Cams PCT will publish Joint Strategic Needs Assessments for Older People and Children and Young People. Both these key assessments identify housing need for existing and new populations and should be used to inform future plans. Future JSNAs will focus on people with physical disabilities, people with learning disabilities and mental health; these also should be used to inform future plans.</p> <p>At Objective 14 welcome inclusion of 'increased opportunities for pursuing a healthy lifestyle, by maintaining and enhancing recreation opportunities and encouraging walking and cycling'. However, to both reduce levels of physical inactivity and promote safety, there should be a firmer commitment to increasing safer routes for both walking and cycling expressed in the spatial principles section.</p>	<p>Strategic Needs Assessment was not available during preparation of the Core Strategy Submission Report and the Overarching Needs Assessment does not provide sufficient information on the number of facilities needed to be able to inform the Core Strategy.</p> <p>Consideration will be given to how best to incorporate the suggestion.</p>	<p>Submission plan revised to strengthen vision and include reference to increasing access to recreational facilities.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Ms Diane Millis	Woodland Trust	Objectives	199	C	The Woodland Trust recommends including an objective on climate change which addresses both how Huntingdonshire can contribute to reducing greenhouse gases and how the area will adapt to the impacts of climate change particularly with reference to biodiversity in order to prevent loss of the area's characteristic habitats and species.	Suggestion accepted. Consideration given to the inclusion of an objective on climate change incorporating both adaptation and mitigation.	Submission plan revised to strengthen objectives and include an additional objective on climate change.
Mr Chris Blackman	Cambs CC	Objectives	473	O	Objective 1 - Re-word to say, . . . which minimise the need to travel and maximise use of sustainable transport modes, while . . . ."	Suggestion accepted. The wording will be included in the Objectives.	Submission plan revised to strengthen objectives and incorporate suggestion into objective 1.
Mr Chris Blackman	Cambs CC	Objectives	474	O	Objective 2 - Re-word to say,"are suited to the requirements of local people, are resilient to projected impacts of climate change, and that an appropriate...."	Suggestion accepted.	Submission plan revised to strengthen objectives and incorporate suggestion into objective 2.
Daniel Heenan	n/a	Objectives	360	O	Amend Bullet point 6 to read: "to enable business development in rural areas, in locations and on a scale which helps to provide local jobs, limits commuting and minimises or mitigates adverse environmental impacts."	The suggested wording or similar will be incorporated. It is considered that objective 4 adequately covers tourism.	Submission plan revised to strengthen objectives and incorporate the suggestion made into objective 6.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Rose Freeman	The Theatres Trust	Objectives	365	C	<p>There is no reference in the objectives to tourism, which is important for the regional and local economy and is supported elsewhere in the document.</p> <p>One of the Objectives is to strengthen the vitality and viability of town centres as places for shopping and leisure. Yet there are no policies to cover the protection of existing and promotion of new developments for tourism, leisure and cultural opportunities. Should include a statement that the loss of an existing facility should be resisted unless it can be demonstrated that it is no longer required or will be rebuilt elsewhere.</p>	The issues raised by the consultee are not covered by the Core Strategy which is a strategic document. Policies on tourist facilities and the retention of local services will be included in the Development Control Policies DPD.	None needed.
Mrs Madelaine Liddiard	Godmanchester TC	Objectives	336	S	Support.	Support noted.	None needed.
Taylor Woodrow Developments Ltd	Taylor Woodrow Developments Ltd	Objectives	642	C	<p>Supports the 15 objectives, but Objective 4 should acknowledge the continuing role of Huntingdon in attracting business related to Cambridge particularly where it can provide employment for people</p>	<p>It is considered that the suggested detail is more appropriate to the Spatial Principles. Consideration of how best to incorporate this into the revised vision will be given.</p>	<p>Submission plan revised to strengthen the vision and include information on how to reduce out commuting.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Taylor Woodrow Developments Ltd	Taylor Woodrow Developments Ltd	Objectives	643	C	<p>resident within the district who would otherwise commute to Cambridge.</p> <p>Support the 15 objectives, but Objective 2 should support a wider range of housing sites and opportunities to secure delivery. Over concentration on urban redevelopment sites and housing at higher densities will not meet the full range of market demand which includes family and 'executive' type homes necessary to support economic growth.</p> <p>Needs to emphasise:</p> <ul style="list-style-type: none"> <li>- the deliverability of land to sustain the delivery of a five year supply in the medium and longer terms</li> <li>- sites which are not subject to major infrastructure constraints</li> <li>- which can add to the range and choice of housing available</li> <li>- that are in sustainable locations within the spatial planning areas of the principal towns.</li> </ul>	<p>While it is acknowledged that the deliverability of housing is an important part of the strategy objective 2 is considered to be appropriate as it is essential that housing meets the requirements of local people considering the increasing proportion of older single person households. The importance of maintaining delivery will be adequately covered elsewhere in the Core Strategy and so no change to the objectives is considered necessary.</p>	None needed.

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Table 14 Representations received to chapter 4 Sustainable Development

Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Ian Burns	Cambs PCT	6.2	178	C	<p>Include the following recommendations:</p> <p>Ensure the concept of social and community development is considered alongside developments; Ensure community facilities are available from the start; Build infrastructure for social cohesion and social capital into the framework; Require development partners to agree measures of social cohesion and build these into routine monitoring indicators; Require regular review and evaluation of indicators with the local community as partners; Ensure sustainability (resource, management and delivery);</p> <p>For existing developments: Require developers and planners to review existing provision of the infrastructure for social cohesion; Require developers and planners to remedy deficiencies during the later phases of the build; Involve existing communities in the planning of the new/ next phase of development. (Source – Dr Goh's impact of social environment on mental health &amp; lessons learned from the New Towns.)</p>	The source will be reviewed and consideration will be given to the incorporation of appropriate elements bearing in mind the strategic nature of the Core Strategy.	Submission plan revised to strengthen the chapter on sustainable development and include criteria on some of the issues raised by the consultee such as community empowerment and involvement and promoting health and wellbeing.
Strawsons Devt t/a Omnivale	Strawsons Devt	6.2	553	S	<p>Although the principle of policy wording 1 is supported the approach taken to Ramsey and Bury elsewhere in the Core Strategy is not consistent with policy wording 1.</p>	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Gary Parsons	Anglian Water	Policy Wording 1	8	C	A Water Cycle Study would ensure the development is implemented in a sustainable way and reduce adverse impact to environment	A Water Cycle Study is being completed for the Core Strategy.	Submission plan revised to strengthen Implementation and Infrastructure chapter and includes information provided by the Water Cycle Study.
Geoff Keeble	Highways Agency	Policy Wording 1	57	S	The criteria relevant to the Highways Agency should achieve more sustainable outcomes through the planning process.	Support noted.	None needed.
Gareth Ridewood	CPRE	Policy Wording 1	79	S	Support all points	Support noted.	None needed.
Mr Philip Raiswell	Sport England	Policy Wording 1	157	C	Strengthen the policy by adding: <ul style="list-style-type: none"> <li>Ensuring the provision of a quality green environment and new (and improved) sports and recreation facilities and greenspace within communities to a recognized standard and quality.</li> <li>Promoting active lifestyles through the spatial arrangement and design of development.</li> </ul>	Agree this issue needs to be included.	Submission plan revised to strengthen policy on sustainable development and include a criteria on promoting healthy and active lifestyles by protecting and enhancing greenspace and recreational facilities.
Alison Melnyczuk	St. Ives TC	Policy Wording 1	147	S	Support	Support noted.	None needed.
Tom Gilbert-Wooldridge	English Heritage	Policy Wording 1	120	S	Add "preserving and enhancing" to the beginning of the sixth criteria and "and their setting" to the end	Suggestions accepted.	Submission plan revised to strengthen sustainable development policy and incorporate changes as suggested.
Mr Justin Tilley	Natural England	Policy Wording 1	314	S	Support – especially the emphasis on enhancement for habitats and species	Support noted.	None needed.
Miss Rachel Pateman	Wildlife Trust	Policy Wording 1	270	S	Expand the objective for "maintaining and enhancing the range and vitality of characteristic habitats and species" to include "and creating viable ecological networks".	Inclusion of the suggestion is accepted.	Submission plan revised to strengthen sustainable development policy and incorporate changes as suggested.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Matthew Stock	Redrow Homes (South Midlands) Ltd	Policy Wording 1	291	O	Fourth criteria is not consistent with Spatial Objectives. Instead of reference to "curtailing," which is unrealistic, it should read "minimising"	Clarification accepted, although reduction of greenhouse gases in order to tackle climate change is essential.	Submission plan revised to strengthen sustainable development policy and incorporate changes as suggested.
Mr Steven Harvey	n/a	Policy Wording 1	189	C	The SA/SEA comments that several essential elements are not specifically mentioned in Policy P1 Sustainable Development. These social and economic objectives should not be omitted.	Changes proposed through the SA/SEA process will be incorporated.	Submission plan revised to strengthen sustainable development policy and incorporate changes as suggested. The policy now includes additional criteria relating to the social and economic dimensions of sustainable development.
Mr Steven Harvey	n/a	Policy Wording 1	186	O	Object to criteria 3 this does not reference PPS25 and 8 which is too general. Policy wording 1 therefore disregards national guidance in PPS25 Flood Risk and PPS1 Climate Change. This is a fundamental omission that would cause the Core Strategy to be found 'unsound' for failing to reflect current Government Guidance.	The climate change supplement to PPS1 was published after the Core Strategy Preferred Options it is therefore unreasonable to expect its contents to be fully reflected in the document. More specific reference to PPS25 is accepted as necessary. Consideration will be given to how best this can be incorporated while unnecessary repetition of national policy.	Submission plan revised to strengthen sustainable development policy and include a more specific criteria relating to water consumption and flood risk in accordance with PPS25
Mr Steven Harvey	n/a	Policy Wording 1	184	O	Object to the inconsistent approach between Core Strategy and SA. Core Strategy P1 should refer to the SA objectives as essential elements of sustainable development. It is clear that the 'urban concentration' theme of the Core Strategy cannot adequately address these sustainable development principles.	It is important to recognise that the SA has been integral to plan preparation at each stage of development and it is therefore considered unnecessary to explicitly state the SA objectives for this policy and every other policy in the Core Strategy. The interdependence between the SA and Core Strategy is sufficiently clear and set out in Volume 2 and the SA. The SA has assessed each policy in detail and found them all to be sustainable, including the spatial strategy. It is	Submission plan revised to strengthen the supporting text and reasoned justification for the sustainable development policy. Volume 2 considers the relationship between the two in greater detail and sets out how the SA has influenced plan preparation.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr David Reavell	O&H Properties	Policy Wording 1	205	O	Sustainable Development should be achieved primarily through the selection of the direction, type and level of growth rather than relying solely on individual developments to deliver specific sustainability initiatives. Policy wording 1 is not specific to Huntingdonshire and does not add to the requirements of PPS1 Climate Change.	not clear from the representation how the spatial strategy is not sustainable. It should be noted that the Climate Change Supplement to PPS1 was published after the Preferred Options. Care has and will be taken to minimise repetition of national and regional policy. It is considered that the policy is essential in addition to through the selection of the direction, type and levels of growth sought, to ensure that development is sustainable. It is considered that development will not necessarily be sustainable even if the selection of the direction, type and levels of growth sought is considered to be sustainable.	Submission plan revised to strengthen the supporting text and reasoned justification for the policy on sustainable development which now includes reference to climate change and PPS1 Climate Change. volume 2 also now references PPS1 Climate Change in the policy context boxes.
Ms Diane Millis	Woodland Trust	Policy Wording 1	229	C	Policy gives insufficient emphasis to the need to adapt to climate change and concentrates too heavily upon habitats protected under existing conservation designations (eg SSSIs). Change criteria 7 to: 'maintaining and enhancing the range and vitality of all priority habitats and species under the UK BAP including native woodland, within Huntingdonshire, while also implementing measures to ensure they can adapt to climate change'	It is not considered necessary to include the suggestions as the monitoring proposals incorporate targets relating to UK BAP targets. The policy is intended to be wide ranging to cover all habitats and species.	Submission plan revised to strengthen the policy on sustainable development.



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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Martin Leyland	Barratt Strategic	Policy Wording 1	223	O	Sustainable Development should be achieved primarily through the selection of the direction, type and level of growth rather than relying solely on individual developments to deliver specific sustainability initiatives. Policy wording 1 is not specific to Huntingdonshire and does not add to the requirements of PPS1 Climate Change.	It should be noted that the Climate Change Supplement to PPS1 was published after the Preferred Options. Care has and will be taken to minimise repetition of national and regional policy. It is considered that the policy is essential in addition to through the selection of the direction, type and levels of growth sought, to ensure that development is sustainable. It is considered that development will not necessarily be sustainable even if the selection of the direction, type and levels of growth sought is considered to be sustainable.	Submission plan revised to strengthen the supporting text and reasoned justification for the policy on sustainable development which now includes reference to climate change and PPS1 Climate Change. volume 2 also now references PPS1 Climate Change in the policy context boxes.
Chris Blackman	Cambs CC	Policy Wording 1	484	O	Re-word the latter half of the 6 <sup>th</sup> criterion to say, "... including the conservation and management of buildings, sites and areas of architectural, historic or archaeological importance".	Suggested accepted.	Submission plan revised to strengthen sustainable development policy and incorporate change as suggested into criterion 6.
Mr C Behagg	n/a	Policy Wording 1	438	S	Support	Support noted.	None needed.
Bank Trustees	Bank Trustees	Policy Wording 1	464	S	Support	Support noted.	None needed.
Mr T Smith	n/a	Policy Wording 1	373	S	Support	Support noted.	None needed.
Mr John Scott	Stamford Homes	Policy Wording 1	399	O	Stamford Homes objects to the inclusion of detailed criteria which are more appropriately included within the Development Control DPD or are a matter for the building regulations. The ability of the site at Field Road, Ramsey to accord with the criteria in Policy Wording 1 has been summarised.	In order to demonstrate the intentions of the Council that development in the district should be as sustainable as possible it is considered appropriate to make appropriate strategic level requirements. The criteria have and will be considered carefully to maintain the strategic nature of the Core Strategy.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mrs Madelaine Liddiard	Godmanchester TC	Policy Wording 1	337	S	Support	Support noted.	None needed.
Lands Improvement	Lands Improvement	Policy Wording 1	352	O	Amend to: "An assessment will be required to accompany any proposal for major development to demonstrate how the criteria have been met where appropriate."	Major development was considered to be a universally understood definition referring to 10 or more dwellings or 1000sqm of business floorspace. This will be clarified. It is not considered appropriate to include "where appropriate" as it is considered that prospective developers should demonstrate that they have considered all the criteria even if the conclusion is that the particular criterion is not applicable to the development in question.	Submission plan revised to clarify the meaning of major development in a footnote to policy CS1.
William Evans	WharfLand Investments	Policy Wording 1	385	C	Add to criteria 1 "re-use of brownfield land and mixed brownfield and greenfield opportunities"	It is considered to be implicit that in making the best use of land that brownfield redevelopment opportunities used appropriately along with mixed brownfield and greenfield areas. No change is considered to be necessary in the policy wording, however the supporting text should be expanded to include suitable wording as suggested.	Submission plan revised to strengthen reasoned justification for policy CS1 and include reference to maximising brownfield opportunities in sustainable locations.
Mr J Stokes	n/a	Policy Wording 1	453	S	Support	Support noted.	None needed.
Mrs J Daniels	n/a	Policy Wording 1	506	S	Support	Support noted.	None needed.
Adam Ireland	Environment Agency	Policy Wording 1	535	S	Include reference to requirements for Energy Efficiency measures within new development.	Agree. The policy will be revised to include reference to energy efficiency.	Submission plan revised to include reference to energy efficiency in CS1, criterion 2.
Gates Hydraulics	Gates Hydraulics	Policy Wording 1	488	S	Support	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Marlborough Developments Ltd	Marlborough Developments Ltd	Policy Wording 1	525	O	Sustainable Development should be achieved primarily through the selection of the direction, type and level of growth rather than relying solely on individual developments to deliver specific sustainability initiatives. Policy wording 1 is not specific to Huntingdonshire and does not add to the requirements of PPS1 Climate Change.	It should be noted that the Climate Change Supplement to PPS1 was published after the Preferred Options. Care has and will be taken to minimise repetition of national and regional policy. It is considered that the policy is essential in addition to through the selection of the direction, type and levels of growth sought, to ensure that development is sustainable. It is considered that development will not necessarily be sustainable even if the selection of the direction, type and levels of growth sought is considered to be sustainable.	Submission plan revised to strengthen the supporting text and reasoned justification for the policy on sustainable development which now includes reference to climate change and PPS1 Climate Change. volume 2 also now references PPS1 Climate Change in the policy context boxes.
Mr Steven Harvey	n/a	6.3	156	S	We support the statement 'Sustainable Development is at the heart of planning and is essential to address the issue of climate change'. We support the SA/SEA conclusions that 'in line with PPS25 the PO2 policies should protect high flood risk areas from development and require sustainable drainage systems to be incorporated into all new developments.	Support noted.	None needed.
Chris Blackman	Cambs CC	6.3	475	O	Add an explanatory reference to SUDS and others as appropriate.	SUDs is adequately covered within the Development Control Policies DPD and it is not considered necessary to go into such detail in the Core Strategy which is intended to be strategic in nature.	None needed.

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Table 15 Representations received on policy wording 2 Strategic Housing Growth

Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Paul Cronk	Home Builders Federation	7	97	O	No reference is made to the production of a Strategic Housing Land Availability Assessment as required by PPS3. The housing requirement can therefore not be known until this has been completed. Reference to the HLAA is now considered irrelevant.	As the Consultee is aware the Council has produced a Housing Land Availability Study. The Study was nearing completion when the Government issued SHLAA guidance. The Council decided to complete the HLAS in line with the draft guidance and then to undertake any work necessary to produce a SHLAA. The additional work is underway and will inform the Submission version.	SHLAA to be submitted alongside the Plan.
Clients of Barker Storey Matthews	Barker Storey Matthews (Agent)	7	459	S	The overall settlement strategy and hierarchy is supported. However, in rural areas specific account should be taken of the potential availability of brownfield sites in villages. Where such sites occur and are capable of development and their development could deliver significant community benefit in response to an expressed need this should be accounted as a material consideration and the scope for an exception considered.	It is considered that appropriate provision for development in key service centres and smaller settlements is made in the Settlement Hierarchy.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option
Taylor Woodrow Developments Ltd	Taylor Woodrow Developments Ltd	7	641	S	Support the approach taken to spatial planning areas. However, find it confusing that Brampton, Godmanchester and Little Paxton are then also defined as Key Service Centres.	Support noted. The hierarchy as set out is considered appropriate as it clearly identifies Brampton, Godmanchester and Lt Paxton as settlements that have a significant level of services and individual character that would not be recognised if they were treated as 'just' part of the spatial planning areas. The treatment as suggested does not recognise this individual character and the separate settlements are treated as if they were just another part of the towns that they are in close proximity to.	None.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Geoff Keeble	Highways Agency	7.1	55	C	Improvements to the transport network will influence the delivery of housing and employment growth in more sustainable locations.	It is useful to know which areas of the transport network the Highways Agency consider to be particularly important for the delivery of development.	A strengthened section on Infrastructure and Implementation has been included in the Plan.
Mr Steven Harvey	n/a	7.2	192	O	We object to the section (paras 7.2 to 7.6) relating to the concept of Spatial Planning Areas; we believe that the process of spatial planning is intended to strengthen the social, economic and environmental linkages between all the settlements within the district in order to make the district as a whole more sustainable.	There is scope to expand the explanation of spatial planning areas. This should be addressed for submission.	The supporting text for Spatial Planning Areas has been given more detail as to how the settlements within them relate to each other. They are considered to be the most sustainable locations for major growth, while the approach to be taken for all other settlements is set out in the settlement hierarchy.
Mr Gareth Ridewood	CPRE	7.3	80	C	Suggests adding 'whilst maintaining different characters, and being clearly separated by green spaces and water courses which will be maintained' to the end of the first sentence.	Whilst the wording suggested is rather specific, it is acknowledged that an important part of the character of the area is the green/natural separation. A reference to the spatial portrait should be considered where this point can be expanded.	The supporting text has been amended by including this point.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Tim Fryer	Brampton PC	7.3	324	C	Huntingdon, Brampton and Godmanchester should remain physically separate and retain separate identities.	It is acknowledged that the green/natural separation between the settlements in the Huntingdon Spatial Planning Area is an important part of the character of this area. This can be expanded upon in the Spatial Portrait.  Support noted.	The supporting text has been amended by including this point  None needed.
Lenton Trustees (L019)	Lenton Trustees	7.3	407	S	Our client agrees with the notion of the Huntingdon Spatial Planning Area, and considers the close physical and functional relationship of Huntingdon, Brampton and Godmanchester should lead to the settlements being considered jointly in terms of the most appropriate locations for strategic housing growth.		
Russell Saywell	n/a	7.4	33	S	Little Paxton is clearly linked to St Neots in terms of location and function and it is therefore correctly included as part of the St Neots Spatial Planning Area.	Support noted. With reference to Planning Area a reference to the Spatial Portrait should be considered with additional information about the relationship of the settlements.	The supporting text for Spatial Planning Areas has been given more detail as to how the settlements within them relate to each other.
Mr Gareth Ridewood	CPRE	7.4	81	C	Would reword the policy after River Great Ouse to add.....' this identity and clear separation will be maintained.' Also concerned that the wording too strongly links Little Paxton with St Neots regarding development opportunities. Little Paxton is not an area that should be considered for growth of this nature.	A reference to the Spatial Portrait should be considered with additional information about the relationship of the settlements.	The supporting text for Spatial Planning Areas has been given more detail as to how the settlements within them relate to each other
Stamford Homes (Midlands) Ltd	Stamford Homes (Midlands) Ltd	7.4	264	S	Support the St Neots Spatial Planning Area. However, consider there are other additional smaller scale development opportunities in this area which should be looked upon favourably.	It is not considered necessary to make explicit reference to locations for moderate or minor development. The settlement hierarchy makes provision for particular scales of development in settlements. Clarification of the role of the strategy and opportunities for moderate and minor scale development	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Connolly Homes Plc, David Wilson Es	Connolly Homes Plc, David Wilson Estates	7.4	444	O	We do not object to the concept of a St Neots Spatial Planning Area, rather we are unclear as to the implications for Little Paxton based upon the findings of the HLAA. There needs to be greater clarity.	including links between the distribution of strategic housing locations and the settlement hierarchy should be considered.	larger scale where site specific circumstances demonstrate that this would secure the most sustainable option
Bank Trustees	Bank Trustees	7.4	465	S	Our client agrees with the notion of the St Neots Spatial Planning Area, but considers due to the presence of appropriate development land to the east/south east of St Neots, Little Paxton should be considered as a secondary location for housing growth in line with its 'Key Service Centre' status.	It is acknowledged that clarification of the role for Little Paxton in the strategy is necessary. Elsewhere in the policy development in KSC is handled differently so there is potential for confusion. Support noted, although it is now clarified that Little Paxton is not identified as a strategic location for housing. Therefore the approach in the settlement hierarchy sets the housing development policy for the village as a KSC.	The reference to Little Paxton has been removed from Policy CS2. The reference to Little Paxton has been removed from Policy CS2.
Mr Michael Palmer-Asplin	n/a	7.5	26	O	Considers it appropriate for a nearby village with a close physical and functional relationship with its 'host' Market Town to be included in the corresponding Spatial Planning Area. The St Ives Spatial Planning Area should include (a) the important employment locations in Holywell-cum-Needlingworth parish at Compass Point and Parson's Green and (b) Needlingworth village, given the close physical and functional relationship with St Ives market town.	While it is acknowledged that some clarification of the St Ives Spatial Planning Area is required regarding the employment areas east of the town it is not considered appropriate to include Needlingworth.	None
Alison Melnyczuk	St. Ives TC	7.5	148	C	In addition to the flooding constraint to the south of St Ives there is also an inherent problem with 'surface water flooding' to the west and north of the town and this will be exacerbated with additional development unless extensive surface water attenuation schemes are incorporated.	The main flood risk to St Ives lies to the south in the floodplain of the Great Ouse. Development to the west of the town will need to bring forward appropriate surface water attenuation but	None

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Matthew Stock	Redrow Homes (South Midlands) Ltd	7.5	286	O	Text to be amended to recognise the positive advantages offered by the guided busway and A14 improvements in terms of sustainable growth and to acknowledge that there is scope for development to the north of the town.	consultation with the Environment Agency has indicated development is feasible in this area.  It is considered that sufficient reference to the benefits of the Guided Busway and the A14 are contained in the Spatial Portrait and Planning Context. It is considered that land to the north of St Ives is constrained in landscape terms. This area is also some distance away from the town centre and so is less sustainable than the preferred option of land to the west/south west.	None needed.
Stamford Homes (Midlands) Ltd	Stamford Homes (Midlands) Ltd	7.5	258	S	Support the notion of St Ives Spatial Planning Area. The issue of flooding is identified to the south which suggests it is not a constraint in other directions.	Support noted. It is considered that reference is made to the Spatial Strategy where more detail about flood risk can be included.	None needed.
Strawsons Devt t/a Omnivale	Strawsons Devt t/a Omnivale	7.6	556	O	Paragraph 7.6 should be amended as follows: delete significantly from the last sentence; and add the following sentences: 'For these reasons development has been limited in recent years compared with the other Spatial Planning Areas, but this has eroded the role and function of the town in the settlement hierarchy. Some growth, but on a lesser scale than in the Huntingdon and St Neots Spatial Planning Areas, is justified now to aid regeneration, to redress community imbalances and to enhance sustainability. The Main opportunity for development is on the previously developed land comprising the former RAF Upwood.'	The identification of locations for 300 homes in the Ramsey Spatial Planning Area is considered to be the most appropriate scale of development for the area. Structure Plan policy 10/3 is still saved and as such 300 is considered to be the upper limit of what can be considered 'limited and small scale'. The exact location of sites to accommodate development will be a matter for the Planning proposals DPD	None needed.
Edwards	n/a	7.6	493	S	Support the notion of the Ramsey Spatial Planning Area. The close physical and functional relationship of Ramsey, Bury and part of RAF Upwood should lead to the settlements being considered jointly in terms of the most appropriate locations for housing growth.	Support noted. The exact location of sites to accommodate development will be a matter for the Planning Proposals DPD.	None needed.



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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Gary Parsons	Anglian Water	Policy Wording 2	9	C	Provision of wastewater services must ensure existing capacity of the sewerage system is not compromised.	It is useful to have some detail about where AWS see constraint issues. It is acknowledged that a water cycle study is necessary. Such a study should highlight constraints.	A strengthened section on Infrastructure and Implementation has been included in the Plan. Further information is being sought through the Local Investment Framework.
Church Commissioners	Church Commissioners	Policy Wording 2	14	O	<p>Support the inclusion of south-east/east Godmanchester as a location for mixed-use development;</p> <p>2. the relationship with the Huntingdon West AAP needs to be further clarified. We also feel that all of the areas referred to in the AAP should be given further consideration;</p> <p>3. aspects of the policy that relate to its operation and need further details</p> <p>4. identifiable non-strategic sites and suggest should be given further consideration.</p> <p>It is unclear how the scale of development outlined in the Settlement Hierarchy will operate in relation to the Strategic Housing Growth policy.</p>	<p>Support noted.</p> <p>The relationship between the Core Strategy and the Huntingdon West Area Action Plan should be clarified by stating that significant redevelopment will take place west of the town centre. It is already clear that small and moderate scale sites do not form part of the strategic housing development locations identified. The opportunity for small and moderate scale development in appropriate settlements is identified and provision is made in the settlement hierarchy.</p>	None needed
Mr Michael Palmer-Asplin	n/a	Policy Wording 2	25	O	The allocation to Ramsey is too large, given its poor workforce:jobs ratio and its remote location. A modest allocation of, say, 250-300 dwellings should be allocated to miscellaneous rural sites, with the advantages of being more attractive to local builders, providing for affordable housing in rural areas and reducing the effect of any delays to large sites. This	Provision for small sites to come forward is made in the settlement hierarchy. It is not considered that the level of Strategic Housing Development identified would put this at risk	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Russell Saywell	n/a	Policy Wording 2	34	O	<p>element of the supply would be found from a reduction in the allocation to Ramsey and other locations.</p> <p>An allowance should be made for non implementation of some commitments/future allocations. A 10% rate would suggest that the Council should plan to provide at least 6,000 additional homes.</p>	<p>The level in Preferred Options is consistent with the EoE Plan. The requirement is recognised as a minimum. This is addressed by clearly stating in the Strategic Housing Growth policy that 'at least' 5450 homes will be delivered. The plan period has been specifically extended to 2026 to ensure that there is a least a 15 year provision. Monitoring indicates that maintaining a 5 year land supply will only become a problem in 3 to 4 years time. It is acknowledged that further consideration of delivery is needed. There is no clear justification for an additional 10% allowance for non implementation.</p> <p>Additional housing delivery will come from small and moderate scale sites through the settlement hierarchy in addition to specific locations identified in the Strategic Housing Growth policy.</p>	None needed.
Geoff Keeble	Highways Agency	Policy Wording 2	52	S	<p>Development should be supported in areas where it can facilitate improvements to the benefit of new and existing residents</p>	<p>Support noted.</p>	None needed.
Geoff Keeble	Highways Agency	Policy Wording 2	63	C	<p>Development on the scale proposed for the Huntingdon area would be heavily reliant upon the Ellington to Fen Ditton TPI scheme coming forward since it would enable improved road access to Huntingdon town centre and railway station, together with the additional highway capacity to accommodate trips generated by further development in the A14 corridor.</p>	<p>Comments noted. Phasing and implementation will be considered further to ensure infrastructure delivery does not adversely affect housing development.</p>	<p>A strengthened section on Infrastructure and Implementation chapter has been included in the Plan. Further information is being sought through the Local Investment Framework.</p>

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr. Paul Ryan	The Stukeleys PC	Policy Wording 2	32	S	The Parish Council supports the approach taken in that in the Huntingdon Spatial Planning Area strategic housing growth is to be located on primarily brownfield sites and only a limited take of greenfield land at Godmanchester. The Parish Council would oppose any proposal to extend further major housing development within its boundaries. The Council supports the development of a significant urban extension to the St Neots, which although it requires greenfield land, does not impact on any neighbouring communities.	Support noted.	None needed.
Mr Paul Cronk	Home Builders Federation	Policy Wording 2	95	C	HDC will need to realistically ensure that a range of both brownfield and greenfield sites are available.	Comments noted. It is considered that there should be sufficient deliverable sites both greenfield and brownfield available through the implementation of this strategy.	None needed.
Mr Paul Cronk	Home Builders Federation	Policy Wording 2	99	C	The housing requirement figure is a minimum in terms of housing delivery. Housing provision will need to be made for 15 years from date of plan adoption.	Comments noted. The requirement is recognised as a minimum. This is addressed by clearly stating in the Strategic Housing Growth policy that 'at least' 5450 homes will be delivered. The plan period has been specifically extended to 2026 to ensure that there is a least a 15 year provision.	None needed.
Mrs Lorraine Russell	Ramsey TC	Policy Wording 2	101	S	Unless Ramsey and Bury's designation as a Market Town can be justified by reference to the need to upgrade infrastructure provision, development should be limited to infill only.	It is considered that opportunities exist in the Ramsey Spatial Planning Area to affect improvements in transport infrastructure, services, facilities and to address local employment issues including out-commuting. To do so will require a holistic package of measures making use of opportunities that are available.	A strengthened section on Infrastructure and Implementation chapter has been included in the Plan. Further information is being sought through the Local Investment Framework.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr John Chase	Buckden PC	Policy Wording 2	130	C	The Council believes that it would sensible to devise alternatives for the Core Strategy in case the Brampton Road Viaduct and the thus the Huntingdon/Godmanchester bypass is retained. It further believes that the bulk of the Huntingdon West Area Plan could be completed even if the bypass was retained.	Studies for the Cambridgeshire Local Transport Plan have shown that the changes to the A14 should not cause additional congestion and pollution in the Huntingdon West area and should enable improved access to Huntingdon town centre. The Council has recognised that changes to the A14 will be critical to plans for the Huntingdon West area and so has committed to producing the HWAAP.	None needed.
Alison Melnyczuk	St. Ives TC	Policy Wording 2	152	C	Although accepting that some additional development will need to be accommodated within St Ives further allocations should avoid ribbon development between St Ives and Houghton.	Site specific details will be considered as part of the Planning Proposals DPD so it is considered that there is sufficient detail in terms of identification of locations for development in the Core Strategy.	None needed.
Tom Gilbert-Wooldridge	English Heritage	Policy Wording 2	121	O	The Policy Wording 2 on pages 19-20 is detailed in terms of where new homes will be provided, but the supporting text does not explain how these locations have been identified. Furthermore, the policy and supporting text lacks any reference to the potential environmental impacts that such development would bring. Seeks consideration of impact of housing locations on the historic environment.	The SHLAA provides the main evidence base as to the reasons for identifying housing locations.  The Development Control Policies DPD will consider appropriate policies to protect the historic environment.	None
Mrs Vanessa Lavender	n/a	Policy Wording 2	82	O	The preferred approach on Key Service Centres has the potential to contradict the Spatial Vision. Concern expressed about the loss of village character in Sawtry if further development occurs.	The level of development identified for Sawtry is considered to be appropriate for the village to help maintain services and support the local economy. While fears about harm to the character of the village are understandable it is considered that this level of development will have a limited impact. Concerns can be addressed through the allocations process for the Planning Proposals DPD.	None

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr S Ross	n/a	Policy Wording 2	104	O	The Key Service Centres have capacity to accommodate a greater quantum of additional housing development than proposed. It is considered that at Yaxley, the policy should be worded in such a way so as to allow a modest greenfield urban extension to the southwest in addition to development on previously-developed land within the existing built-up area.	It is not considered appropriate to make provision in the Strategic Housing Growth Policy for locations that will not deliver larger scale housing. It is however considered to be inappropriate to make provision for a strategic greenfield housing development south of Yaxley as it does not have a range of facilities comparable with those in the identified spatial planning areas.	None needed.
Mrs Laura West	n/a	Policy Wording 2	108	O	This approach on Key Service Centres has the potential to contradict the Spatial Vision. Concern expressed about the loss of village character in Sawtry if further development occurs.	The level of development identified for Sawtry is considered to be appropriate for the village to help maintain services and support the local economy. While fears about harm to the character of the village are understandable it is considered that this level of development will have a limited impact. Concerns can be addressed through the allocations process for the Planning Proposals DPD.	None.
Mr David Youles	Yaxley PC	Policy Wording 2	132	S	Support expansion for Huntingdon, St Neots and St Ives. Concern expressed over expansion in Yaxley.	Support noted. Diagram 5.7 was included along with the issue, options and questions that formed part of consultation at earlier stages. These were intended to show the range of options considered previously and were not part of what was being considered at this stage.	None needed.
Lesley Burdett	Shelter	Policy Wording 2	136	S	The portion of socially rented housing should be at least 65%.	It is acknowledged that of the affordable housing delivered through the strategy a large proportion will need to be social rented. Consideration will be given to inclusion of a specified proportion in the affordable housing policy.	Submission plan amended including amendments to policy CS4.
Milton (Peterborough) Estates Ltd	Milton (Peterborough) Estates Ltd	Policy Wording 2	176	O	Provides limited scope for development beyond Market Towns. Scope should also be included for moderate development at Key Service Centres and to a limited extent in sustainable villages.	It is not considered appropriate to specifically identify smaller scale development locations in the strategic housing growth policy. The settlement hierarchy makes provision for appropriate scale development in settlements. Clarification of the role of	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Gareth Ridewood	CPRE	Policy Wording 2	308	C	<p>Brownfield - PDL target should be increased to meet national targets. Windfall Allowance - this should be included in the figures or it will lead to over allocation of greenfield land.</p> <p>Locations - we need to take seriously the environmental capacity of the district to take the growth required by the Government. Development should be phased with sustainable economic development. Existing greenspace between villages, and market town settlements should be maintained to preserve the character of the area and avoid coalescence. Significant investment in strategic greenspace enhancement, greenspace within new developments, and green corridors must be core to any development proposals.</p>	<p>the strategic housing growth policy and the settlement hierarchy should be considered.</p> <p>While it may be possible to increase the proportion of previously developed land used for housing it is not possible to achieve the national target in Huntingdonshire due to the rural character of much of the district and the agricultural rather than industrial heritage which means there are limited large scale previously developed sites in sustainable locations. It is very difficult to get clear evidence to support an allowance for windfall development because by its very nature, windfall development cannot be predicted. The Council will keep housing delivery under review through annual monitoring and will adjust allocation as required. It is considered to be unnecessarily repetitious to state that there is a brownfield first policy when this is explicit in national guidance. It is acknowledged that the policy could be clearer in terms of what will be expected, especially in terms of infrastructure, as part or along side development. Consideration should be given to how this can best be achieved within the strategic nature of the strategy and the other policies in the DPD.</p>	None needed
Miss Rachel Pateman	Wildlife Trust	Policy Wording 2	273	C	<p>We question whether the location of major new developments in St Ives, Brampton and Godmanchester are in the right location for the creation of sustainable communities. Residents in the new development to the east of St Neots must have access to natural greenspace that does not rely on unsustainable modes of transport.</p>	<p>While it is acknowledged that green transport links are a very important part of ensuring development is as sustainable as possible, there are many other important aspects that must be considered. It is considered that the locations identified give the best opportunity for new development to be as sustainable as possible.</p>	None needed

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Matthew Stock	Redrow Homes (South Midlands) Ltd	Policy Wording 2	287	O	We object to the Council's preferred development strategy of concentrating the majority of growth in the Huntingdon and St Neots Spatial Planning Areas. We also strongly object to the proposal to provide only 500 homes in the St Ives Spatial Planning Area. Inadequate account is taken of the significant investment in transport infrastructure taking place and due to take place in the Huntingdon-Cambridge transport corridor. Policy Wording 2 should be amended to recognise that there is scope for additional sustainable housing development at St Ives and the number of homes proposed to be provided at St Ives should be increased by at least 200 to contribute to meeting sub-regional needs.	Land east of St Ives, as indicated in this representation is at significant risk of flooding (HDC SFRA 2004). Following detailed discussions with the Environment Agency it is considered that although there is some land that could be considered to be at no or minimal risk of flooding that large scale development in this location would not be easily achieved and should not be part of the Preferred Option.	None needed.
National Grid Property Ltd	National Grid Property Ltd	Policy Wording 2	285	C	Policy Wording 2 is supported on the basis that identified future growth should rightly be directed to the most sustainable locations of Huntingdon and St Neots Spatial Planning Areas. Similarly the emphasis on the use of previously developed land is supported. The Policy would benefit, however, from clarification as to the appropriate locations for redevelopment of previously developed land and should make specific reference to land which is close to and well related to the built up area of Huntingdon.	Support noted. The suggested wording is welcomed but is considered to be surplus to requirements because by stating that the redevelopment of previously developed land is within the built up area of Huntingdon, development will be well related to existing facilities. There are also virtually no previously developed sites that could be defined as being in close proximity to the built up area of the town but not actually part of the built up area, which is what is suggested by the suggested wording.	None needed.
Mr Steven Harvey	n/a	Policy Wording 2	195	O	We object to Policy P2 and the proportion of development that is proposed to be concentrated within the Spatial Planning Areas.	The Spatial Policy Areas are by far the most sustainable locations and it is therefore appropriate that most growth is directed to these areas.  It is not considered appropriate to identify smaller scale development locations in the strategic housing growth policy. The settlement hierarchy makes provision for moderate and small scale development in appropriate settlements. Clarification of the role of the strategic housing	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr David Reavell	O&H Properties Ltd	Policy Wording 2	207	O	We object to the lack of recognition of the growth potential in and around Yaxley on the basis that it does not take advantage of Yaxley's relationship with Peterborough and the potential to deliver sustainable growth on a larger scale. For clarity 'about' 250 homes should be replaced with 'at least'.	growth policy and the settlement hierarchy should be considered.  The wording of 'about' and 'at least' were used specifically to convey development that could be a small amount above or below this level and development that was definitely not below this level respectively. It is considered that despite some sustainable characteristics Yaxley is not a suitable location for larger scales of growth.	None needed.
FLP	FLP (Agent)	Policy Wording 2	279	S	Our client considers that the policy should provide for the provision of a minimum of 10,414 dwellings in the plan period 2007-2026 of which, 6,492 dwellings will need to be identified on new sites.  A more balanced distribution of new housing development between the spatial planning areas and the key service centres should be provided. Supports additional development in Sawtry.	The calculation in this comment is wrong. The total requirement for 2001 to 2026 is correct. The completions are higher at 3554. Commitments from permissions should be higher at 4375. 10% for non completion is arguably too high, but would be 437. This gives a total to identify of 6458. Part is from Local Plan allocations without permissions 1240, leaving 5218. By this calculation the Core Strategy is over providing by 232. It is not considered appropriate to identify locations for development of small or moderate scale. The settlement hierarchy makes provision for these scales of development in appropriate settlements. Where considered necessary, following continued monitoring of delivery moderate scale allocations may be made in the Planning proposals DPD in line with this hierarchy.	None needed.
Stamford Homes (Midlands) Ltd	Stamford Homes (Midlands) Ltd	Policy Wording 2	271	O	Our client considers that the policy should provide for the provision of at least 10,414 dwellings in the plan period 2007-2026 of which 6,492 dwellings will need to be identified on new sites.	The calculation in this comment is wrong. The total requirement for 2001 to 2026 is correct. The completions are higher at 3554. Commitments from permissions should be higher at 4375. 10% for non completion is arguably too high, but would be 437. This gives a total to identify of 6458. Part is from Local Plan	None needed.



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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Stamford Homes (Midlands) Ltd	Stamford Homes (Midlands) Ltd	Policy Wording 2	260	O	It is considered that the Policy should provide for the provision of at least 10,414 dwellings in the plan period 2007-2026 of which, 6,492 dwellings will need to be identified on new sites. Promotes a greater quantity of housing development in St Ives.	allocations without permissions 1240, leaving 5218. By this calculation the Core Strategy is over providing by 232.  The calculation in this comment is wrong. The total requirement for 2001 to 2026 is correct. The completions are higher at 3554. Commitments from permissions should be higher at 4375. 10% for non completion is arguably too high, but would be 437. This gives a total to identify of 6458. Part is from Local Plan allocations without permissions 1240, leaving 5218. By this calculation the Core Strategy is over providing by 232. St Ives is constraint to a significant extent by flood risk and by landscape, the latter of which is particularly the case to the north of the town. Land to the north is also significantly further from the town centre than less constrained land to the west that has been identified. It is therefore considered that 500 is the most appropriate scale of housing development for St Ives.	None needed.
St John's College, Cambridge	St John's College, Cambridge	Policy Wording 2	307	S	We support an approach which directs a significant proportion of growth for Huntingdon to Huntingdonshire to Huntingdon.  Policy Wording 2 should refer to at least 1800 homes being provided in the Huntingdonshire Spatial Planning Area to ensure for conformity with the emerging Regional Spatial Strategy for the East of England.	Support noted. Comments about the 1800 for Huntingdon SPA are wrong. The wording states "at least 1800" and so does not require amendment.	None needed.
Mrs Joanne Taylor	n/a	Policy Wording 2	233	O	The preferred approach on key service Centre contradicts the Spatial Vision. Concern expressed about the negative impact on Sawtry of further growth.	The level of development identified for Sawtry is considered to be appropriate for the village to help maintain services and support the local economy. While fears about harm to the character of the village are understandable it is considered that this level of development	The policy has been amended to clarify that the actual level of development on sites at Sawtry will be determined

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Martin Leyland	Barratt Strategic	Policy Wording 2	224	O	We object to the lack of recognition of the growth potential in and around Yaxley on the basis that it does not take advantage of Yaxley's relationship with Peterborough and the potential to deliver sustainable growth on a larger scale. The policy is unclear and should be reworded for clarity.	The wording of 'about' and 'at least' were used specifically to convey development that could be a small amount above or below this level and development that was definitely not below this level respectively. Further consideration will be given to the appropriate location and level of development in each KSC in the Planning proposals DPD. It is considered that despite some sustainable characteristics Yaxley is not a suitable location for larger scales of growth.	The policy has been amended to clarify that the actual level of development on sites at KSCs will be determined through the Planning Proposals DPD.
Bewick Homes	Bewick Homes	Policy Wording 2	255	O	Our client objects to the overall disposition of housing requirements set out in this policy, as this provides extremely limited scope for development beyond the District's market towns.	It is not considered appropriate to identify smaller scale development locations in the strategic housing growth policy. The settlement hierarchy makes provision for moderate and small scale development in appropriate settlements. Clarification of the role of the strategic housing growth policy and the settlement hierarchy should be considered.	None needed.
B Gray Esq	n/a	Policy Wording 2	294	S	We support the provision of 5450 homes in Policy Wording 2 and in particular the expansion of the Key Service Centre at Fenstanton and the general direction for its growth.	Support noted.	None needed.
Messrs Bakesef & Mailler	n/a	Policy Wording 2	297	S	We support the Spatial Planning Area for Huntingdon and the growth envisaged at Godmanchester and its general direction.	Support noted.	None needed.
Bedfordia Developments	Bedfordia Developments	Policy Wording 2	300	S	We support the intention to concentrate the majority of growth in the Huntingdon and St Neots Spatial Planning Areas and we consider St Neots in particular well placed to cater for large scale development.	Support noted.	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Scotfield Ltd	Scotfield Ltd	Policy Wording 2	292	C	<p>We support an approach which directs a significant proportion of growth to the Huntingdonshire Spatial Planning Area. The inclusion of Brampton within the Huntingdonshire Spatial Planning Area is particularly welcomed.</p> <p>Policy Wording 2 should refer to at least 1800 homes being provided in the Huntingdonshire Spatial Planning Area to ensure for conformity with the emerging Regional Spatial Strategy for the East of England.</p> <p>Policy wording 2 should also refer to development at Brampton on land on the edge of the settlement as well as on previously developed land.</p> <p>Reference to development at Godmanchester should be removed from Policy Wording 2.</p> <p>Our client's land at Brampton, as shown on the plan attached to this form should be allocated for housing development.</p>	<p>The 1800 homes figure for the Huntingdon SPA is prefixed by 'at least'. No change is therefore required. With reference to the AMR 2007 it is clear that there is well in excess of the required 5 year land supply, such that complying with this requirement will not be a problem for several years. There is therefore no need for additional housing development in the short term. In the medium term there will be a requirement for further housing delivery however the requirements for housing supply apply to the whole district and so it would not be necessary for housing development specifically in Brampton to be delivered. It is also considered that the Spatial Strategy should remain strategic in nature and as such should not seek to identify all locations where housing development, particularly of small and moderate scale development, will be allocated or considered acceptable. In the Planning Proposals DPD allocations will be made in accordance with the strategy as set out in the Core Strategy, however there will be the potential to allocate further sites depending on requirements, in line with the settlement hierarchy and sustainable development principles.</p>	None needed.
Mr S Biart for Fairfield/Luminus	Fairfield/Luminus	Policy Wording 2	304	O	<p>The inclusion of the land under Policy Wording 2 for future development to the south east/east of Godmanchester within the 'Preferred Approach' is both welcomed and supported. Having however undertaken detailed investigations and traffic surveys, it is not the representors view that there is a justifiable reason why the development of this land should be dependent on the completion of the A14 road improvements. The representors therefore object to the inclusion of this</p>	<p>The current situation with the location severed by the A1198 is not conducive to the development of an integrated community.</p> <p>Further consideration of phasing and infrastructure requirements will be given in the Infrastructure &amp; Implementation Chapter.</p>	<p>The Infrastructure &amp; Implementation Chapter has been significantly strengthened</p>

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr S Biart for Fairfield/Luminus	Fairfield/Luminus	Policy Wording 2	305	S	<p>The inclusion of the land to the south east/ east of Godmanchester within Policy Wording 2, the Council's Preferred Approach to Housing, is welcomed and supported. Like the Council, the representatives also consider that this is an excellent site to accommodate a high quality urban extension to Godmanchester that will be able to address the housing needs of Godmanchester and "Greater Huntingdon".</p>	Support noted.	None needed.
Mr S Biart for Fairfield/Luminus	Fairfield/Luminus	Policy Wording 2	301	C	<p>While the inclusion of the land to the south east/ east of Godmanchester within the 'Preferred Approach' for Housing, Policy Wording 2, is both welcomed and supported, the reference to the development of the site being part of a mixed use development is not clear. The inclusion of the site within Policy Wording 7, the Preferred Approach for Employment, does not provide any further clarification. Having had numerous discussions with the Council it is, and always has been, the representatives firm opinion that any development on this land is to be residential led. The wording of the Preferred Approach to both Housing and Employment does not clearly identify this as being the case, and should therefore be amended.</p>	<p>The strategy is intended to be strategic and therefore should not be site specific or overly prescriptive about mix of uses.</p>	None needed.
Mr Tim Fryer	Brampton PC	Policy Wording 2	328	C	<p>Brampton is included in current Huntingdon West AAP – thus Brampton featuring in two of the three Huntingdon development areas listed. Building development in Brampton should be limited to RAF Brampton - Huntingdon West AAP development area should be limited to Huntingdon - ie excluding Brampton Parish.</p>	<p>The Core Strategy is a strategic document and it is right that it identifies Brampton as part of the Huntingdon Spatial Planning Area.</p> <p>The HW AAP will sit within the framework established by the Core Strategy. It is not considered that this implies that there is an overlap which</p>	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
The Diocese of Ely	The Diocese of Ely	Policy Wording 2	347	S	Support	would result in a greater level of development. Support Noted.	None needed.
Lord De Ramsey	Ramsey Estates	Policy Wording 2	430	O	Our client objects to the overall disposition of housing requirements set out in this policy, particularly in respect of the low level of housing growth directed to Ramsey (300 units) when compared to the other 'most sustainable locations' (as defined by paragraph 5.34 of the Core Strategy) of Huntingdon (1800 units), St Neots (2600 units) and St Ives (500 units). It is suggested that this be increased to 400 homes and that this includes provision for growth at the north east of the town.	Ramsey is more sustainable and offers a wider range of services and facilities than Key Service Centres, and its allocation in the preferred option is significantly higher than that for the KSCs, which in total is less than that for Ramsey. However, it has a lower level of services and is in a less sustainable location than the other Market Towns and therefore it is appropriate that a smaller level of development is proposed than in those more sustainable locations	None needed.
The Diocese of Ely	The Diocese of Ely	Policy Wording 2	441	S	We strongly support the identification of land to the east of St Neots for a strategic scale urban extension. The site is clearly deliverable and can contribute significantly to the targets for housing, employment and retailing development over the Plan period.	Support noted. Further detail about deliverability of development east of St Neots is essential and should be sought.	The Infrastructure & Implementation Chapter has been significantly strengthened.
Connolly Homes Plc, David Wilson Es	Connolly Homes Plc, David Wilson Estates	Policy Wording 2	442	O	There needs to be greater clarity of the amount of development directed to Little Paxton. A "small number of homes" is open to misinterpretation in the light of the contents of the Housing Land Availability Study 2007	The wording for Lt Paxton is acknowledged to be potentially misleading and inconsistent with wording for other settlements. Clarification is needed.	The reference to Little Paxton has been deleted from the policy.
D R Juggins	n/a	Policy Wording 2	389	O	Our client objects to the overall disposition of housing requirements set out in this policy, as this provides extremely limited scope for development beyond the District's market towns.	The settlement hierarchy provides scope for limited development in rural settlements. It is considered that scope within the settlement hierarchy is sufficient and that the strategic housing growth policy should identify only those locations that are capable of delivering large scale development. In this way the policy will remain strategic in nature.	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Lenton Trustees (L019)	Lenton Trustees	Policy Wording 2	408	O	Our client objects to the overall disposition of housing requirements set out in this policy, and considers that a more balanced distribution between the Huntingdon Spatial Planning Area and the St Neots Spatial Planning Area would be appropriate. In addition, it is considered that Greenfield housing land to the west of Brampton should be identified for development.	While some of the points put forward support the argument that the Huntingdon Spatial Planning Area is more sustainable than St Neots the measures of sustainability as recognised by the representation are multifaceted. As it is, the site put forward is less sustainable than the locations identified in the preferred option and is constrained by noise from the A1, which is likely to be added to by the A14 changes.	None needed.
Bank Trustees	Bank Trustees	Policy Wording 2	466	O	Our client supports the overall disposition of housing requirements set out in this policy, and in particular the dominance of the St Neots Spatial Planning Area. However, the Policy is opposed in terms of the preferred locations of development which does not promote for the development of land at the south-east of the settlement.	The Core Strategy deals with strategic locations for development. The site boundaries will be determined through the Planning Proposals DPD.	None needed.
Mr C Dodson	n/a	Policy Wording 2	412	O	Objects to the overall disposition of housing requirements set out in this policy, and consider that a greater level of development should be directed to Key Service Centres outside of the Spatial Planning Areas. In addition it is considered that this policy should include provision for the small scale development of land west of King Street, Somersham. The level of increase suggested is an additional 50 homes which represents a modest addition which does not undermine the wider spatial strategy and its core objective of concentrating development at the most sustainable market towns of Huntingdon and St Neots.	It would not be sustainable to identify strategic levels of growth in locations beyond the Spatial Planning areas  The Core Strategy is strategic in nature and should therefore not be concerned with the identification of sites or locations that fall significantly below this level. Provision for this type of development is provided in the settlement hierarchy.	None needed.
Mrs Warnes	n/a	Policy Wording 2	420	O	Objects to the overall disposition of housing requirements set out in this policy, and consider that a greater level of development should be directed to Key Service Centres outside of the Spatial Planning Areas. In addition it is considered that this policy should include provision for	It would not be sustainable to identify strategic levels of growth in locations beyond the Spatial Planning areas.  The settlement hierarchy makes provision for moderate scale development in Key Service Centres and	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Sainsburys Supermarkets Ltd	Sainsburys Supermarkets Ltd	Policy Wording 2	422	C	<p>We support the broad distribution of growth between Huntingdon, St Neots and St Ives as proposed by Policy 2, subject to our further comments below. We object to the lack of clear guidance on the strategy for addressing retail requirements and improving the town centre in Huntingdon in Policies 2 and 8.</p>	<p>this is considered to be sufficient to allow for development that will address local needs and support local services and employment. The Strategic Housing Growth policy identifies locations that are considered suitable for large scale development. The wording of identifying development locations for KSCs should be considered with flexibility in mind.</p> <p>Support noted. Although clarification of the retail elements of mixed use development identified for Huntingdon should be considered, identification of key aspects of the retail strategy for the town centre of Huntingdon should be identified in the appropriate policy and not the Strategic Housing Growth policy</p>	None needed.
Mr John Scott	Stamford Homes	Policy Wording 2	400	O	<p>The amount of housing being provided will not be sufficient to meet the district's housing requirement within the plan period. Additional greenfield sites with a minimum capacity of 620 dwellings need to be identified. In view of the scale of growth already proposed for some of the Spatial Planning Areas and Key Service Centres, the shortfall in housing provision should be made good by increases of approximately 150 dwellings in the Ramsey Spatial Planning Area and in those Key Service Centres where no new provision has been identified.</p>	<p>The calculation in this comment is wrong. The alleged under provision of 620 dwellings is actually an over supply (The Council's allocation of 5450 is greater than the requirement, calculated in this representation, of 4375 by approx. 620)</p>	None needed.
Ely Diocese	Ely Diocese	Policy Wording 2	320	O	<p>The analysis of the housing land supply situation indicates that more homes will be needed on greenfield land to ensure sufficient supply as the identified capacity on previously developed land will be less than the Council anticipate due to site constraints, phasing and other commercial constraints. The additional homes on greenfield land will ensure the critical rate of 550 dwellings per year are delivered.</p>	<p>Without detailed information to back up this representation it is difficult to address this specifically. Through the HLAS and continuing work on a district SHLAA the Council has taken a pragmatic, but cautious approach to site capacity. Although it is likely that some sites will not deliver the amount attributed to them it is as likely that other sites will deliver more. It is therefore</p>	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Ely Diocese	Ely Diocese	Policy Wording 2	348	O	Development to east of the railway at St Neots is strongly supported as it is the best location in the District for additional development, without constraint. More homes will be needed on greenfield land to ensure sufficient supply. The additional homes on greenfield land will ensure the critical rate of 550 homes per year are delivered.	considered that there is no need to identify additional greenfield development. Without detailed information to back up this representation it is difficult to address this specifically. Through the HLAS and continuing work on a district HLAA the Council has taken a pragmatic, but cautious approach to site capacity. Although it is likely that some sites will not deliver the amount attributed to them it is as likely that other sites will deliver more. It is therefore considered that there is no need to identify additional greenfield development.	None needed.
Mrs Madeleine Liddiard	Godmanchester TC	Policy Wording 2	338	C	Broadly support the spatial planning approach but oppose the proposals for Godmanchester. Land should not be designated for mixed use to the south east/east.	It is considered that the location is one of the most sustainable within the Huntingdon Spatial Planning Area.	None needed.
Lands Improvement	Lands Improvement	Policy Wording 2	354	O	This policy wording sets out the preferred directions of growth in the four spatial planning area yet fails to assess the alternative directions and explain why they were discounted. There is also no clear justification as to how the housing numbers have been divided between these spatial planning areas. Promotes land to the west of Little Paxton.	The reasoning behind the strategy will be clarified.	Submission plan amended including amendments to policy CS2.
Mrs Susan England	n/a	Policy Wording 2	353	O	Preferred approach objectives contradicted by policy wording as additional housing in Sawtry will lead to more commuting.	As detailed in the Settlement Hierarchy Background Paper as there are a range of local services, facilities and local employment opportunities Sawtry is considered to be suitable for some housing growth. It is therefore identified as a Key Service Centre and a share of 250 homes over the plan period.	None needed.
Mr N Hollis	Altodate Ltd	Policy Wording 2	355	O	Whilst supporting further significant development in St Neots, objection is lodged in respect of the reliance on	It is considered reasonable that housing delivery will be achievable at the levels identified. Lt Paxton would not	None needed.



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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
William Evans	WharfLand Investments	Policy Wording 2	380	C	<p>delivering 2450 homes on one greenfield site to the east of the town during the next 18 years. To address this provision should be made for alternative/additional more deliverable options and land at Little Paxton should be considered.</p> <ul style="list-style-type: none"> <li>Huntingdon is acknowledged as a key market town for growth by virtue of its status, existing retail provision, services and existing transportation infrastructure.</li> <li>Wharf objects to the dispersed growth pattern and the market town expansion suggested at St Neots, St Ives and Ramsey and the level of development proposed at Godmanchester, Fenstanton and Sawtry.</li> <li>Wharf proposes that the Council's market town growth strategy is replaced with strategic development at a new Spatial Planning Area known as Conington Spatial Planning Area. This location would accommodate a sustainable mix of residential and commercial uses in the form of a new community or a new settlement, possibly in the form of a new Eco Town.</li> <li>Wharf proposes development that relates to a "linked settlement" growth pattern between Peterborough, Conington and Huntingdon.</li> <li>The Conington Spatial Planning Area would link to growth already identified to the west of Huntingdon.</li> </ul>	<p>necessarily be a suitable alternative choice. Sites will be determined in the Planning Proposals DPD.</p> <p>A new settlement would require significant investment in infrastructure and would delay housing delivery. A significant factor in the discounting of new settlement options previously considered by the Council was two fold; firstly the lead in time would be considerable with the implementation of significant new infrastructure and could not be accurately predicted; secondly the requirements from PPS3 for a 5 year land supply could not be reliably maintained due to uncertainty of the lead in time and few sites coming forward for delivery in the medium term because of the lack of additional locations.</p>	None needed.
Caton Trust	Caton Trust	Policy Wording 2	415	C	<p>Support identification of Bury alongside Ramsey as a Market Town. Support wording that recognises that some housing growth will be necessary on greenfield land. Urge the Council not to be too prescriptive in identifying exact locations of greenfield growth in the Core Strategy as it would pre-empt proper consideration of suitability of sites which should be part of a later site specific DPD.</p>	<p>Support noted. The Council considers the detail contained to be appropriate. The site put forward in this representation is considered to be unlikely to comply with the description for development to the west of the town.</p>	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Stanton Group Developments Ltd	Stanton Group Developments Ltd	Policy Wording 2	452	S	Support the concept of mixed use development in Huntingdon and in the Huntingdon West Area Action Plan area.	Support noted.	None needed.
Mr J Stokes	n/a	Policy Wording 2	456	O	Our client objects to the overall disposition of housing requirements set out in this policy, and considers that a greater level of development should be directed to Key Service Centres outside of the Spatial Planning Areas. In addition it is considered that this policy should include provision for the development of land to the south of Warboys.	It is considered that the Core Strategy should be concerned with the strategic identification of housing development. Therefore the modest level of development considered appropriate for Warboys was not specifically identified in the Strategic Housing Growth policy. Provision is made in the Settlement Hierarchy for this level of development. Clarification of the Strategic nature of the Core Strategy and the Strategic Housing Policy will be made.	Submission plan amended including amendments to policy CS2.
Mr Chris Blackman	Cambs CC	Policy Wording 2	497	C	Support the approach of the policy which represents a good balance for education provision albeit with objections to some wording details.	Support noted.	None needed.
Mr Chris Blackman	Cambs CC	Policy Wording 2	499	O	Add, at the end of the first paragraph in Policy Wording 2, "whilst observing environmental designations and constraints throughout the District."	Suggestion accepted.	Submission plan amended including amendments to policy CS2.
Mr Roy Reeves	Warboys PC	Policy Wording 2	635	S	Support	Support noted.	None needed.
Mr S Juggins	n/a	Policy Wording 2	592	O	We support major growth in Huntingdon but would ask for the direction of development to be west along Stukeley Road.	The Preferred Options are considered to represent the most appropriate level of development for Huntingdon and St Neots. For Huntingdon this takes into account recent development, existing commitments and allocations and the proposed changes to transport infrastructure including the timing. It also takes into account the likely timing of development and infrastructure provision.	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Hunting Trust	Hunting Trust	Policy Wording 2	588	S	We support the proposed policy wording 2 and the key diagram in respect of the village of Sawtry. We support the key diagram and policy wording 2 in identifying land to the west of Sawtry as suitable for residential development. The figure of 250 houses for Sawtry, Yaxley and Fenstanton should be increased to 500.	Support noted. No reasoning is given for increasing the amount of housing that is identified in KSCs so it is considered that no change should be made.	None needed.
France, Gaulty & Camvill Dev Ltd	France, Gaulty & Camvill Dev Ltd	Policy Wording 2	605	O	We support the identification of Godmanchester for further residential growth. We support in particular the identification of land south west of Godmanchester both policy wording and figure 7.1 key diagram. We object however to identification south east of Godmanchester of mixed development on land east of the A1198. Even with the A14 diversion in place, that site is too remote from the town for residential development. Key diagram and policy wording 2 should therefore be amended to indicate that direction of growth is only suitable for employment. The scale of development being proposed in this representation is more appropriate for Godmanchester.	Although it is acknowledged that the A1198 currently presents a significant barrier to integration of the development location east of Godmanchester the changes to the A14 should allow successful integration.	None needed.
Lafarge Aggregates	Lafarge Aggregates	Policy Wording 2	604	O	St Neots area should be recognised as a key area of growth and we support the inclusion of Little Paxton as part of this growth.	The identification of Lt Paxton in the policy will be clarified. The Council does not intend Lt Paxton to be the location for large scale housing development. Lt Paxton has seen substantial development in recent years and has substantial commitments remaining.	Submission plan amended including amendments to policy CS2.
BBSRC	BBSRC	Policy Wording 2	526	S	The preferred approach for 400 additional houses to be provided west of St Ives is supported as this is consistent with the sequential approach to concentrate future development within and adjoining market towns in the Cambridge sub-region.	Support noted.	None needed.
Mrs J Daniels	n/a	Policy Wording 2	507	O	Our client objects to the overall disposition of housing requirements set out in this policy, and considers that a greater level	It is not considered necessary to identify small scale development locations and as such it is considered that the	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Persimmon Homes	Persimmon Homes	Policy Wording 2	542	O	<p>of development should be directed to Key Service Centres outside of the Spatial Planning Areas. In addition it is considered that this policy should include provision for the development of land to the west of Warboys.</p> <p>We consider that Hemingford Grey would meet the criteria for Key Service Centres in RSS14 and it is a comparatively sustainable location for further development given its facilities, proximity to St Ives and the range of facilities available there and its bus services. Recommend that Hemingford Grey is included within the policy and wording to the paragraph on St Ives and put forward our client's site (site 14 in St Ives of the HLAS 2007).</p>	<p>settlement hierarchy provides sufficient provision for smaller sites in appropriate settlements.</p> <p>With reference to the Settlement Strategy Background Paper it is considered that Hemingford Grey does not have sufficient range of services and facilities and does not meet the criteria in the EEP and as such is not designated as a Key Service Centre</p>	None needed.
Gallagher Estates	Gallagher Estates	Policy Wording 2	543	S	<p>Gallagher Estates suggest the following additional paragraph is inserted between paragraph 7.4 and 7.5 to read: "there are two important features of a sustainable urban extension to the east of St Neots that distinguish it from other potential areas for growth in the District and in combination allow for a more sustainable form of development to be advanced in this area: - It can be integrated with an existing allocation to the east of the railway line (known as Loves Farm) and is well related to existing and proposed facilities within this existing allocation. This integration with existing development will enable the creation of a segment of the town that will contribute positively to its character and to its community life and enable the integration of land use and transport in accordance with objectives for sustainable development. - It benefits from proximity to St Neots railway station, where there are fast and frequent services to Huntingdon, Peterborough, Bedfordshire towns and</p>	Support noted.	None needed.

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Strawsons Devt t/a Omnivale	Strawsons Devt t/a Omnivale	Policy Wording 2	557	O	<p>London. Residents within any development within this area would be within easy walking/cycling distance of the station."</p> <p>Policy wording 2 should be amended as follows: 'In the Ramsey Spatial Planning Area where at least 750 homes will be provided. Of these at least 700 will be on previously developed land, about 50 will be on greenfield land and 250 will be affordable. Provision will be made in the following general locations: In an employment led mixed use redevelopment to the west of the town, including the former RAF Upwood, to the north of the town and as development of land within the built-up area of the town.'</p>	<p>The distribution and scale of development identified is considered appropriate. 300 is considered to be the most appropriate scale of development for Ramsey. The Structure Plan considers that the emphasis should be on improving economic performance in Ramsey. To this end the Strategy identifies employment led mixed use development to the west of the town. The identification of RAF Upwood is too site specific for the Core Strategy which should only be locationally specific.</p>	None needed.
Persimmon Homes (East Midlands) Ltd	Persimmon Homes (East Midlands) Ltd	Policy Wording 2	561	O	<p>The spatial strategy fails test iv of tests of soundness outlined in paragraph 4 of Volume two of the Preferred Options Consultation Document, as the strategy fails to consider the advice written in Paragraph 24 of the addendum report to PPS1: Planning and Climate Change (December 2007), PPG13: Transport and Paragraph 5.69 of the EEP panel Report. Spatial strategy should focus growth into the Huntingdon area.</p>	<p>The supplement to PPS1 on Climate Change could not be taken into account as it was published after the Preferred Options. It will be taken into account for the Submission Version. The Core Strategy has to be in conformity with the EEP not the panel report.</p>	Submission plan amended including amendments to policy CS1.
Taylor Woodrow Developments Ltd	Taylor Woodrow Developments Ltd	Policy Wording 2	639	O	<p>It would be more appropriate given the uncertainty regarding key infrastructure delivery, if the Core Strategy were to determine the broad distribution of development between spatial planning areas. Greenfield allocations in Ramsey and St Ives should be reduced, none made at Fenstanton and the allocation at St Neots reduced to a level that can be properly justified by a rigorous and robust analysis of infrastructure capacity.</p> <p>The allocations within the Huntingdon spatial planning area should be increased as it is the employment and communications hub of the district and to</p>	<p>Infrastructure is identified as a significant factor across the district in determining the location of growth. A Local Investment Framework is being prepared which will further inform the phasing of development and the priorities for infrastructure delivery. National guidance does not require Strategic Environmental Assessment and Sustainability Appraisal of individual sites at this stage and these are considered unnecessary in establishing the locational strategy.</p>	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Sywell Land Ltd	Sywell Land Ltd	Policy Wording 2	609	O	<p>reflect available capacity for growth within existing infrastructure thresholds. Development also needs to be robustly justified with respect to the timing of infrastructure, specifically the A14 works, and to the development of community infrastructure provisions.</p> <p>Whilst giving general indications about the direction of growth, the Key Diagram(s) should clearly indicate that the delivery of such growth would be focused on locations rather than specific sites and will involve a mixture of greenfield and previously developed land and that sites would be identified on the basis of the criteria set out at Policy 1.</p>	<p>The basis for the suggested increase is not explained in full so it is considered that not change should be made. The main concern of the representations is the inclusion of existing allocations without planning permission. The Council considers these allocations to be sound, however clarification of the existing allocations will be made.</p> <p>With regard to the proposals for Yaxley, as the full range of services and facilities are not available in the village it is wrong to suggest that Yaxley has the characteristics of a market town. The availability of services and facilities in Yaxley is recognised and it is identified as a Key Service Centre and a location for moderate scale housing development. This is considered to be the most appropriate approach for the village.</p>	None needed.
Mr Burgess	n/a	Policy Wording 2	514	O	<p>The housing figures are considered inadequate to meet the District's strategic requirement and should be increased by 620 dwellings; the total requirements less the commitments. Additionally we are seeking a reduction in the total of the Huntingdon, St Neots and St Ives SPAs by 10% to facilitate a Direction of Growth to the west of Yaxley.</p>	<p>It is intended that the policy identifies locations that are suitable for large scale development and that locations that are suitable for smaller scales of</p>	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Jockey Club Racecourses	Jockey Club Racecourses	Policy Wording 2	624	O	Service Centres outside of the Spatial Planning Areas. In addition it is considered that this policy should include provision for the development of land on the periphery of Yaxley. The level of increase suggested is at least an additional 50 homes which represents a modest addition which does not undermine the wider spatial strategy and its core objective of concentrating development at the most sustainable market towns of Huntingdon and St Neots.  We object to policy wording 2 that states that St Neots should get most of the housing growth in the District and consider that St Neots should have more limited housing growth until it has a more sustainable balance between jobs and employees. Brampton and Godmanchester should receive a percentage of growth for the Huntingdon area as they are sustainable locations for development.	development are not specifically identified, instead relying on the guidance in the settlement hierarchy.	None needed.
Edwards	n/a	Policy Wording 2	496	O	Objects to the overall disposition of housing requirements set out in this policy, particularly in respect of the low level of housing growth directed to Ramsey (300 units) when compared to the other 'most sustainable locations' (as defined by paragraph 5.34 of the Core Strategy) of Huntingdon (1800 units), St Neots (2600 units) and St Ives (500 units).	While it is acknowledged that Ramsey is more sustainable and offers a wider range of services and facilities than Key Service Centres, the scale of development in the preferred option is significantly higher than that for the KSCs.	None needed.
Paul Seabrook	Seabrook Farms	Policy Wording 2	629	O	Object to the emphasis on providing 5450 and then basing distribution on this figure. More flexible targets should include allowance of 10% for sites that do not come forward which should then be reflected in the distribution and location of these allocations.  All the options considered included some growth at Kimbolton and the preferred option should do so too. Kimbolton should receive a small allocation of new housing to support the vitality and viability of the town centre.	Ensuring provision and delivery of housing development will be undertaken through monitoring and the Planning Proposals DPD. At this stage it is considered appropriate to plan for 'at least' 5450 homes, which is slightly more than actual requirements, based on recent monitoring.  It was considered that the policy should identify only those locations that are suitable for large scale housing	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Tully	n/a	Policy Wording 2	579	S	Suggest rewording policy wording 2 to include our clients land in Brampton.	The identification of previously developed land in Brampton as a location for housing development is considered to be the most appropriate for this area.	None needed.
Gates Hydraulics	Gates Hydraulics	Policy Wording 2	492	O	We disagree with the Council's preferred location for housing development. This policy states that 71% of housing within Huntingdonshire should be provided on greenfield land. This proportion increases for St Neots and the Core Strategy recommends that 94% of housing in St Neots should be developed on greenfield land. This does not accord with national planning policy and that a far greater proportion of homes should be built on previously developed brownfield land.	Huntingdonshire does not have a good supply of well located brownfield sites. The proportion of greenfield land identified is considered to be a maximum. Many previously developed sites are small and as such would not be appropriate for identification in the policy. The EEP recognises that the 60% target will not be achievable in all districts. While every effort will be made to achieve as high a level of previously developed land re-use as possible it should be acknowledged that it will be impossible to achieve the national target in Huntingdonshire.	The Submission plan has been amended including amendments to the Spatial Vision and the Spatial Objectives.
Marlborough Developments Ltd	Marlborough Developments Ltd	Policy Wording 2	527	O	We object to the lack of recognition of the growth potential in and around Yaxley on the basis that it does not take advantage of Yaxley's relationship with Peterborough and the potential to deliver sustainable growth on a larger scale. The policy is unclear and 'about 250' should be reworded to 'at least 250'.	The sustainability of Yaxley has been recognised with the designation of the village as a Key Service Centre and a location for strategic growth. The wording in the policy, either "about" or "at least" has been carefully chosen, with "about" meaning a number slightly above or below and "at least" meaning a number more than that specified.	None needed.
Burgess Burgess and Cooper	Burgess Burgess and Cooper	Policy Wording 2	551	S	We support the identification of Fenstanton as a key service centre subject to the increase in the amount of housing that should be accommodated in Fenstanton at this key location.	The designation of Fenstanton as a Key Service Centre and the identification of the village as a suitable location for strategic housing development are considered to be appropriate given the availability of services and facilities, access to higher order settlements, the availability of employment and environmental constraints	None needed.



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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Twigden	Twigden Homes	Policy Wording 2	566	O	<p>Policy Wording 2 does not set out the overall housing requirement within the Policy. It plans for a residual of 5,450 dwellings to be provided by 2026. It is considered that a residual requirement of 6,878 dwellings should be planned for.</p> <p>It does not substantiate the limitation of housing growth at Ramsey to 300 dwellings. Ramsey is the Key Market Town in the north of the District and can and should accommodate a higher level of growth.</p> <p>Policy Wording 2 directs development to the north of Ramsey, which will require the use of Greenfield land. More appropriately located, brownfield land is available at the former operational area of RAF Upwood Airfield to the west Ramsey, and at the RAF base itself.</p> <p>Major development is identified on Greenfield sites within the Key Service Centres. This is inconsistent with Policy Wording 3 which permits only moderate levels of development in Key Service Centres.</p>	<p>The policy will be revised to clearly take account of completions, commitments and existing allocations.</p> <p>The EEP is clear that the annual rate from 2006 to 2021 should be used for calculating requirements to fulfil the 15 year supply. The EEP clearly states this as 550 for the District. Therefore the housing requirement for 2021 to 2026 is 2750 homes not 2800 as advocated in this representation. In calculating housing requirements this representation applies a 10% discount to completions between 2001 and 2007. It does not take account of the 1240 homes from existing allocations that do not have planning permission. Both should be included. While it is acknowledged that a substantial amount of previously developed land is available at RAF Upwood, it is consider appropriate for regeneration and sustainability reasons that other locations in the town should be identified including some greenfield development as land to the north of the town has for a long time been part of the regeneration strategy. The perceived inconsistency between policy wording 2 and 3 is intentional. While it is considered appropriate to identify a number of locations that would be suitable for large scale development in Key Service Centres it is considered appropriate to limit most housing development from windfall development to moderate scale.</p>	None needed.
Twigden	Twigden Homes	Policy Wording 2	567	S	<p>Policy Wording 2 is supported in so far as it expresses the overall numbers of homes to be delivered and annual building rates as minima.</p> <p>Policy Wording 2 is supported in so far as it directs development to the west of Ramsey.</p>	Support noted.	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
UK Land Investments	UK Land Investments	Policy Wording 2	585	O	Whilst the Client welcomes the recognition of Buckden as a 'Key Service Centre' in the settlement hierarchy in Policy Wording 3 there is concern at its omission as a location for residential development in the final paragraph to Policy Wording 2. Buckden should be included within the final paragraph as follows: 'Outside the Spatial Planning Areas, in the Key Service Centres of Buckden, Fenstanton, Sawtry and Yaxley, about 250 homes will be provided.'	It was considered appropriate to identify locations that are suitable for large scale housing development. Smaller scale sites can be considered and may be allocated through the Planning Proposals DPD in line with the settlement hierarchy and sustainability objectives, depending on requirements.	None needed.
St Ives GC and D Wilson Est.	St Ives GC and D Wilson Est.	Policy Wording 2	606	S	We support the residential growth of St Ives for a further 500 dwellings, of which 400 will be on a greenfield site to the west of St Ives. This site should be in the most sustainable location which is on the balance of the golf course/The How and immediately adjoins residential development and St Ivo School on the west side of town.	Support noted. It should be noted that the Core Strategy is only locationally specific. Site specific allocations will be dealt with in the Planning Proposals DPD.	None needed.
Mr M Hankins	n/a	Policy Wording 2	608	S	Promotes a site at Whytefield Road in Ramsey as a suitable opportunity for sustainable development within central Ramsey.	Support noted. It should be noted that the Core Strategy is only locationally specific. Site specific allocations will be dealt with in the Planning Proposals DPD.	None needed.
Anderson	n/a	Policy Wording 2	621	C	We support the identification of St Ives as a major area of growth but feel that some of the growth should be to the north west as well as to the west of the town.	The SHLAA considered sites to the north west and north of St Ives and concluded that they were either difficult to integrate with the rest of the town or unsuitable because of their distance from the town centre.	None needed.
Mr T Smith	n/a	Policy Wording 2	650	O	Our client objects to the overall disposition of housing requirements set out in this policy, particularly in respect of the relatively low level of housing growth directed to St Ives (500 units) when compared to the other 'most sustainable locations' (as defined by paragraph 5.34 of the Core Strategy) of Huntingdon (1800 units) and St Neots (2600 units). At the Issues and Options consultation stage objection had been raised by our client in	Flood risk is a significant constraint to the south and east of St Ives which all but rules out growth in these directions. With the town centre in the south east of the town integration and accessibility for any development to the west and north will be particular issues. Additionally the separation of St Ives and Houghton has been identified as important and will be maintained. While development to the west of St Ives does not remove the	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr David Stowell	Spaldwick and Stow Longa PCs	7.7	2	C	<p>respect of the apparent 'downgrading' of St Ives to be considered separately from Huntingdon and St Neots. This implicitly gave St Ives a similar status to the remaining market town of Ramsey which is beyond the Cambridge Sub-Region and where a 'lesser scale of development' has been strategically established.</p> <p>The number of houses already built between 2001 and 2006 should be stated. Account should be taken of possible housing loss due to demolition.</p>	<p>separation it does reduce it. It was therefore considered appropriate to identify a limited level of growth in this direction. To the north west the issues of integration and accessibility to the town centre are considered to be significant enough to rule out this direction as being suitable for growth. The Preferred Options are considered to be the most practical solution to the constraints in St Ives.</p> <p>In is acknowledged that the specific sources of housing are not detailed. Consideration should be given to clarifying housing delivery during the whole plan period.</p>	<p>Policy CS2 amended to include figures of existing commitments. A housing trajectory is included in the Monitoring chapter to illustrate housing delivery from 2001 – 2026 which also includes detailed figures of existing commitments for 2007.</p>
Mr Michael Palmer-Asplin	n/a	7.7	27	C	<p>Greater clarity and transparency is sought in the derivation of the housing completion and permissions figures in para 7.7, particularly the origin of the 8,500 dwellings completed/permitted since 2001.</p>	<p>It is acknowledged that the specific sources of housing are not detailed. Consideration should be given to clarifying housing delivery during the whole plan period.</p>	<p>Policy CS2 amended to include figures of existing commitments. A housing trajectory is included in the Monitoring chapter to illustrate housing</p>

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Peter Glazebrook	HallamLand Management	7.7	397	O	The amount of housing being provided will not be sufficient to meet the district's housing requirement within the plan period. Additional greenfield sites with a minimum capacity of 620 dwellings need to be identified. In view of the scale of growth already proposed for some of the Spatial Planning Areas and Key Service Centres, the shortfall in housing provision should be made good by increases in provision in the Ramsey Spatial Planning Area and in those Key Service Centres where no new provision has been identified; the most sustainable of which is Kimbolton where the greatest proportion, say 50 dwellings, should be identified.	By the calculation in this representation we are over providing by about 620 not under providing. Delivery would be detrimentally impact is a number of the allocations that do not currently have planning permission do not come forward. Consideration should be given to clarifying the sources of housing provision including explicit mention of sites that are allocated but do not currently have planning permission.	Policy CS2 amended to include figures of existing commitments. A housing trajectory is included in the Monitoring chapter to illustrate housing delivery from 2001 – 2026 which also includes detailed figures of existing commitments for 2007.
Mr Chris Blackman	Cambes CC	7.8	478	O	Add to the last sentence but one of the paragraph "whilst also providing sustainable links across the railway to existing facilities in the town".	It is acknowledged that the railway could present integration issues for development east of St Neots. Solutions to this issue will be a key part of master planning for the area. Consideration should be given to the inclusion of text as suggested or similar.	None needed.
Mr Steven Harvey	n/a	7.10	197	O	RESPONSE 14: Strategic Housing Growth - Reasoned Justification We object to Paragraph 7.10 as it fails to make specific reference to national policy in PPS25.	It is not considered necessary for the Core Strategy to make reference to PPS25 in paragraph 7.10.	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Chris Blackman	Cambs CC	7.10	476	O	There should be more explanation of the planning approach to bring forward the St Neots greenfield development	Further detail as to the specific phasing and other requirements of the various locations of growth should be considered in order to clarify delivery.	The Infrastructure and Implementation chapter has been significantly strengthened to include infrastructure requirements and phasing for strategic directions of growth.
Stamford Homes (Midlands) Ltd	Stamford Homes (Midlands) Ltd	7.11	266	S	There should be an approach to facilitate opportunities for housing sites located adjacent to the built up area of towns to come forward.	It is not considered necessary to make the changes suggested as the Strategic Housing Growth policy identifies sufficient locations to deliver the 5450 homes required. Delivery above this should only be on sites within the built up area of the identified settlements in the settlement hierarchy.	None needed.
Mr Peter Glazebrook	HallamLand Management	7.11	395	O	Paragraph 7.11 follows on from paragraph 7.10 and in so doing is too restrictive as it will not enable the requisite number of dwellings to be completed during the plan period.	Previous comments do not prove an under provision.	None needed.

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**Table 16 Representations received on the settlement hierarchy**

Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Alison Melnyczuk	St. Ives TC	7.13	155	C	An additional 500 dwellings mainly to the west of the town will have a detrimental impact on current infrastructure. All additional development should provide sufficient infrastructure to avoid overloading current facilities.	Contributions to the maintenance and provision of facilities will be expected from all strategic locations identified.	None needed.
Church Commissioners	Church Commissioners	Policy Wording 3	15	S	Support	Support noted.	None needed.
Michael Palmer-Asplin	n/a	Policy Wording 3	28	O	Subdivide 'Smaller settlements' to permit Minor-scale development in appropriate cases. Add another criterion - the extent to which a settlement has a close physical and functional relationship with a host market-town. Criticise entries for access to secondary schools and employment for Needingworth in the Settlement Hierarchy Background paper.	It is considered that local needs and the maintenance of services and facilities for smaller settlement can be adequately provided for by the combination of the provisions in the settlement hierarchy and affordable housing exceptions sites policies. Issues raised with regards to the settlement hierarchy background paper are acknowledged, however although the Compass Point employment area is within the Needingworth parish it is considered to relate more closely to St Ives as it is within the built up area of the town.	None needed.
Maydo Pitt	GO-East	Policy Wording 3	38	O	Policy wording should not refer to prescriptive limits but give an indication of likely acceptable scale of development. Proposals will also be judged on individual merits eg design led approach and efficient use of land. Submission policy should include indicative figures only.	It is acknowledged that development proposals will need to respond to local circumstances to make the best use of land. The policy should be amended to refer to an indication of scale	The policy has been amended to refer to the scale of development being indicative.
Russell Saywell	n/a	Policy Wording 3	45	O	Inconsistent and confusing to separate Brampton and Godmanchester from Huntingdon and Little Paxton from St Neots. Add "(including Brampton and	Disagree. The distinction made between the housing growth policy and the settlement hierarchy for Brampton, Godmanchester and Lt Paxton is considered to be	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
					Godmanchester" after Huntingdon and "(including Little Paxton)" after St Neots	appropriate. These settlements do not have the same range of services and facilities as the market towns, while they do have good accessibility to these service and facilities in the towns close by this should not be considered to be the same as having these services in the settlements. These key service centres are considered to be suitable for moderate scale development and the locations for development identified in the strategic housing growth policy should be considered as exceptions to this. The locations identified are specific opportunities for housing development that have been considered at this strategic level collectively with other strategic considerations. This will not be possible with windfall sites and it is considered that it will not be possible to effectively plan for large scale developments that might present themselves during the plan period in these settlements.	
Geoff Keeble	Highways Agency	Policy Wording 3	61	S	Support	Support noted.	None needed.
Mrs Lorraine Russell	Ramsey TC	Policy Wording 3	103	S	Should specify how improvements to Ramsey and Bury's infrastructure and employment opportunities will be brought about. Including Ramsey and Bury as a Market Town is misleading; it is currently only comparable to that of a key service centre in terms of facilities and services.	Ramsey is clearly identified as a market town in the saved Structure Plan policy 10/3. The Strategy makes reference to some of the issues to be tackled by development in Ramsey.	None needed.
P Bryant	Somersham PC	Policy Wording 3	91	O	Contradiction in the designation of Somersham as a KSC. The provision of 35 houses does not take into account the area or infrastructure. It fails to consider Somersham's sphere of influence which includes Colne and Bluntisham.	The 35 homes were proposed in the Towards a Spatial Strategy document. For the Preferred Options it was considered that this level of development was not strategic and would not be identified in the housing growth policy. The settlement hierarchy makes	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Tom Gilbert-Wooldrige	English Heritage	Policy Wording 3	122	C	Need to consider character and form of each settlement as well as access to services and facilities. Include a caveat that development sites will only be appropriate subject to proper environmental assessment.	provision for up to moderate scale development in Key Service Centres such as Somersham, specifically within the built up area. Consideration should be given to clarification of the definition of built up area in relation to the settlement hierarchy. The representation seems to suggest that Somersham should not be a KSC. It is unclear what change should be made as surrounding villages that look to Somersham for local services are referenced when this would support the KSC designation.	None needed.
Mr S Ross	n/a	Policy Wording 3	106	O	Key Service Centres should contain an internal hierarchy with those centres with the greatest capacity to accommodate additional development in a sustainable manner prioritised.	It is considered that the determination of the suggestion of environmental assessment should be considered as part of the development control DPD and is not a strategic issue to be addressed in the Core Strategy.  No prioritisation is considered necessary as development that comes forward will be dependant on opportunities that arise within the settlements. The larger settlements will be more likely to have more opportunities, whereas smaller settlements will have fewer opportunities. It is considered that the limitation of moderate scale development in addition to the availability of development opportunities will be sufficient to allow for appropriate development for the settlements identified as KSCs	None needed.
Mr David England	n/a	Policy Wording 3	110	S	Support inclusion of Warboys as a Key Service Centre	Support noted.	None needed.
Mr and Mrs Eayrs	n/a	Policy Wording 3	133	O	Consideration is not given to the proximity of services provided by other settlements and accessibility via public transport. Change wording	It is not considered appropriate to take this approach in policy. Exceptions will need to be considered if specific proposals come forward as planning	The policy has been amended to state that the scales are indicative which allows a degree of flexibility.



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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Churchmanor Estates Company Plc	Churchmanor Estates Company Plc	Policy Wording 3	250	S	Support	Support noted.	None needed.
Milton (Peterborough) Estates Ltd	Milton (Peterborough) Estates Ltd	Policy Wording 3	193	O	Additional flexibility needed. Categories of development are arbitrary. Indicating minor (9 or less) and major development (10 or more) is more appropriate. Object to removal of settlement boundaries as indicated in Settlement Background Paper as this will not provide any certainty or clarity.	It is acknowledged that additional flexibility should be incorporated as the policy as worded is too rigid. It is however considered that the different scales identified represent an important starting point for defining what development should be considered acceptable in the different settlements. With regard to the removal of settlement boundaries it is not intended that the Core Strategy should include either settlement boundaries or criteria based policies as this is a development control and site specific issue. It is acknowledged that clarification of how the Council intends to define where development can take place should be made.	The policy has been amended to state that the scales are indicative which allows a degree of flexibility. The policy allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Gareth Ridewood	CPRE	Policy Wording 3	238	S	Reference should be made to the promotion of brownfield land and sustainable urban extensions above Greenfield development.	Support noted. Clarification of the application of the scales of development should be incorporated in the text.	The priority for the use of brownfield over Greenfield is set out in Policy CS1 and its supporting text. CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Matthew Stock	Redrow Homes (South Midlands) Ltd	Policy Wording 3	290	S	Support although further growth for North of St Ives should be provided for to the north of the town.	Support noted. As detailed in the Settlement Hierarchy Background Paper it is the Council's intention to remove settlement boundaries and to use a definition of the built up area to determine where development proposals are acceptable. The issue of the direction of growth for St Ives is a matter set out in CS2	demonstrate that this would secure the most sustainable option  None needed.
Mr John Chase	Buckden PC	Policy Wording 3	194	O	Object to classification of Buckden as Key Service Centre. It does not have good public transport links or adequate infrastructure and is outside the Cambridge Sub Region. Reclassify as a smaller settlement.	With reference to the background paper on the Settlement Hierarchy Buckden is one of the more marginal villages but is considered to be appropriate as a KSC due to its range of shops. In recognition of the more limited range of services in comparison with other KSCs Buckden has not been identified as a location suitable for large scale growth.	None needed.
Mr Steven Harvey	n/a	Policy Wording 3	208	O	Object to the HLAA and the Rural Exceptions document in their present form and their use as base evidence to inform the Core Strategy as it fails to provide a proper appraisal of either the needs of the individual communities or the sustainability of the identified sites.	The Exception Sites Study is not listed as a source for the settlement hierarchy and while the Council was aware of its contents the study was not considered to be a source that was significant in the drafting of this policy. The HLAS was under final stages of completion when the Government's revised guidance for SHLAAs was published. At that time it was considered prudent to complete the work on the Study and publish it as such, identifying that it was not a full SHLAA, although fulfilling much of the role of one. Work is now underway to complete a SHLAA for the district, which will be completed to enable it to be fully taken into account in preparation of the submission version	None. The SHLAA will be submitted as a supporting document.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Steven Harvey	n/a	Policy Wording 3	198	O	Bluntisham should be included as a key service centre as it is a more sustainable location for growth than Somersham and should be either in place of or as well as Somersham.	Disagree. Bluntisham has fewer facilities than Somersham and therefore less suitable as a KSC.	None needed
Mr Steven Harvey	n/a	Policy Wording 3	202	O	Object to blanket restriction of residential infilling for smaller settlements. Accessibility and sustainability of each settlement needs to be taken into account and some are appropriate for moderate development to sustain village viability.	The development in Smaller Settlements is limited to residential infilling but Policy CS3 should be amended to make it clear that larger scale development may be acceptable where it is the most sustainable option.	Policy CS3 has been amended to allow for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Mr David Reavell	O&H Properties Ltd	Policy Wording 3	209	O	Yaxley should be allocated as a fifth 'spatial planning area' to reflect its close links with Hampton and Peterborough, which have facilities comparable to a market town.	Yaxley has experienced significant development in recent years and has significant existing commitments. While Yaxley does have a good range of services and facilities and good accessibility to higher order services and facilities in Peterborough it does not have the same range of services as a market town. With these issues in mind it is not considered appropriate to designate Yaxley as part of an additional spatial planning area or identify further development locations for the village.	None needed.
FLP	FLP (Agent)	Policy Wording 3	281	O	No justification for moderate scale of development given – this appears to be arbitrary and is restrictive. Thresholds need to be flexible and should be changed to minor development (up to 9 dwellings) and major development (10 or more). KSCs should be given more flexibility for growth. Sawtry is suitable for major development.	The Policy can be amended to make it more flexible. Sawtry does not have the range of services comparable with a market town and is therefore considered appropriately placed in the KSC category.	Policy CS3 has been amended to allow for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Stamford Homes (Midlands) Ltd	Stamford Homes (Midlands) Ltd	Policy Wording 3	272	S	A flexible approach is needed to maximise development opportunities and undeveloped land on the edge	Support noted. Clarification of where the development scales apply should be incorporated.	CS3 has been amended to state that the scales are

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
					of urban areas should be included when defining the extent of urban areas. This would then be consistent with RSS.		indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Stamford Homes (Midlands) Ltd	Stamford Homes (Midlands) Ltd	Policy Wording 3	261	S	Support	Support noted.	None needed.
Paul Ryan	Stukeleys PC	Policy Wording 3	240	S	Support designation of Great & Little Stukeley as smaller settlements although there may be cases where development of more than 3 dwellings is appropriate to make efficient use of land and provide more affordable housing for local people.	Support noted. It is considered that clarification of the circumstances were flexibility in the scale of development considered acceptable should be incorporated.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Paul Ryan	Stukeleys PC	Policy Wording 3	241	O	Object to removal of settlement boundaries.	This is not considered to be a strategic issue and is therefore more appropriately dealt with in the Development Control Policies DPD.	None in the Core Strategy.
Martin Leyland	Barratt Strategic	Policy Wording 3	225	O	Yaxley should be allocated as a fifth 'spatial planning area' to reflect its close links with Hampton and Peterborough, which have facilities comparable to a market town.	Yaxley has experienced significant development in recent years and has significant existing commitments. While Yaxley does have a good range of services and facilities and good accessibility to higher order services and facilities in Peterborough it does not have the same range of services as a market town. With these issues in mind it is not considered appropriate to designate Yaxley as part of an additional spatial planning area or identify further development locations for the village.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Bewick Homes	Bewick Homes	Policy Wording 3	256	O	Policy is inflexible and restrictive particularly with regards to smaller settlements. Appropriate scale of development should be taken on a site by site basis. Thresholds for moderate scale are arbitrary. Object to deletion of settlement boundaries. Using a criteria based policy will not provide certainty or clarity to new development potential.	While it is acknowledged that further flexibility to take into account site specific circumstances should be incorporated into the policy, it is considered that the scales of development set important guidelines as to the level of development the Council considers is suitable for different types of settlement. The matter of settlement boundaries is not considered to be a strategic issue and is therefore more appropriately dealt with in the Development Control Policies DPD.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
J Ayres Esq	n/a	Policy Wording 3	293	O	Holme should be designated a KSC due to its range of services and proximity to Yaxley and Peterborough.	Referring to the Settlement Hierarchy Background Paper Holme does have some services and facilities but has only a basic public transport service and cannot be considered to serve a wider local area in the same way as other Key Service Centres.	None
B Gray Esq	n/a	Policy Wording 3	295	S	Support designation of Fenstanton a KSC	Support noted.	None needed.
Mrs C Bradbury	n/a	Policy Wording 3	296	S	Support Little Paxton as KSC	Support noted.	None needed.
Messrs Bakesef & Mailler	n/a	Policy Wording 3	298	S	Support	Support noted.	None needed.
Merrill & Chignell	n/a	Policy Wording 3	299	O	Great Gransden should be included as a KSC as it has good services and is close to Cambridge.	The Settlement Hierarchy background paper identifies the fact that Great Gransden has only a basic range of services and employment opportunities. However it has only a basic public transport service and its proximity to Cambridge would mean that any housing development would add to car based commuting.	None needed.
Scottfield Ltd	Scottfield Ltd	Policy Wording 3	306	S	Support identification of Brampton as Key Service Centre.	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Ely Diocese	Ely Diocese	Policy Wording 3	325	O	Prioritise St Neots for development eg add "with a priority towards St Neots". Policy in current form is inflexible and restrictive. Change last sentence to "secures the best use of the site."	St Neots is recognised in the Strategic Housing Growth policy as the main centre for housing development in the district. It is considered that no further distinction is required in the settlement hierarchy. It is considered that additional flexibility should be incorporated into the policy so that the best use of land can be made when sites are developed. Different levels of settlement, including more categories, have been explored through consultation on the Core Strategy so far but the preferred option was considered to be the best option.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option
Mr Peter Glazebrook	HallamLand Management	Policy Wording 3	392	S	Support.	Support noted.	None needed.
Mr C Behagg	n/a	Policy Wording 3	443	S	Support in respect of Fenstanton. This is consistent with RSS & Structure Plan.	Support noted.	None needed.
Lord De Ramsey	Ramsey Estates	Policy Wording 3	431	O	Supportive of the overall settlement hierarchy in respect of market towns as it places Ramsey and Bury alongside Huntingdon, St Neots and St Ives as 'market towns'. Object to restrictive and inflexible nature of the policy, particularly for smaller settlements. To support limited rural growth suggest amendments to allow development of up to 6 dwellings in smaller settlements. Support proposed deletion of settlement boundaries.	It is considered that clarification of the circumstances under which exceptions to the development scales would be acceptable and factors that will be taken into account when considering sites should be incorporated into the policy. As the Strategic Housing Growth policy identifies locations to accommodate all of the housing requirement for the district during the plan period there is no requirement for the settlement hierarchy policy to enable any housing, however it is recognised that limited housing development in suitable settlements is appropriate considering the range of services and facilities available.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Andrew Middleditch	Henry H Bletsoe & Son	Policy Wording 3	418	O	Concerned this policy relegates vast majority of villages to 'smaller settlements' status allowing very few opportunities for development. An additional category of 'group	The approach to settlements taken in the hierarchy is considered to address the identified problems of a continued policy of infill. The differences between infill and small scale development will not make	CS3 has been amended to state that the scales are indicative, but also allows for

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
					settlements' should be identified where basic facilities exist, such as Stilton, Holme, Catworth, Farcet, Gt. Gidding and Alconbury Weston.	sufficient difference to maintain the viability of services and facilities, particularly in the absence of employment opportunities as residents will continue to commute and use services and facilities that are available near to where they work. It is considered that clarification of the circumstances under which exceptions to the development scales would be acceptable and factors that will be taken into account when considering sites should be incorporated into the policy.	development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option
D R Juggins	n/a	Policy Wording 3	390	O	Objects to restrictive and inflexible nature of the policy, particularly for smaller settlements. To support limited rural growth suggests amendments to allow development of up to 6 dwellings in smaller settlements. Support proposed deletion of settlement boundaries.	It is considered that clarification of the circumstances under which exceptions to the development scales would be acceptable and factors that will be taken into account when considering sites should be incorporated into the policy. This is considered to be sufficient to ensure that the best use of land is made and that higher densities are used as advocated in PPS3.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Lenton Trustees (L019)	Lenton Trustees	Policy Wording 3	409	O	Support in respect of Brampton as consistent with RSS and Structure Plan although clarification is needed of where exceptions to development scales may occur.	Support noted. It is considered that clarification of the circumstances under which exceptions to the development scales would be acceptable and factors that will be taken into account when considering sites should be incorporated into the policy.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Bank Trustees	Bank Trustees	Policy Wording 3	469	S	Support	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr C Dodson	n/a	Policy Wording 3	413	O	Support settlement hierarchy as proposed in Policy Wording 3 in respect of unallocated sites with particular reference to Somersham but opposed to deletion of settlement boundaries. Use of criteria based policy will not provide certainty or clarity for potential new development.	Although the approach to settlement boundaries may lead to less clarity there should be more flexibility and more opportunity for development that responds to local requirements. The matter of settlement boundaries is not considered to be a strategic issue and is therefore more appropriately dealt with in the Development Control Policies DPD	None needed.
Mrs Warnes	n/a	Policy Wording 3	426	S	Support.	Support noted.	None needed
Mr John Scott	n/a	Policy Wording 3	401	S	Support.	Support noted.	None needed
Ely Diocese	Ely Diocese	Policy Wording 3	349	O	The Hierarchy should separate out St Neots as the number one priority for development to 2026, eg add "with a priority towards St Neots". Policy in current form is inflexible and restrictive. Change last sentence to "secures the best use of the site."	St Neots is recognised in the Strategic Housing Growth policy as the main centre for housing development in the district. It is considered that no further distinction is required in the settlement hierarchy. It is considered that additional flexibility should be incorporated into the policy so that the best use of land can be made when sites are developed. Different levels of settlement, including more categories, have been explored through consultation on the Core Strategy so far but the preferred option was considered to be the best option.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Mr I R Quince	n/a	Policy Wording 3	331	S	Support particularly Toseland identified as a smaller settlement.	Support noted.	None needed.
Mrs Madelaine Liddiard	Godmanchester TC	Policy Wording 3	339	C	Reluctantly support Godmanchester's designation as a key service centre. However object to substantial developments in Godmanchester (particularly to the south east/east) as this location has serious disadvantages and the town	The Settlement Hierarchy makes provision for windfall development and so limits development in Godmanchester to moderate scale and below. The Strategic Housing Growth Policy makes provision for location where allocations should be made and therefore identifies 'to the south east/east of	None needed,



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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Lands Improvement	Lands Improvement	Policy Wording 3	356	O	<p>has had significant growth in housing without the necessary infrastructure provision in recent years.</p> <p>Object to arbitrary thresholds for development as they will not make efficient use of land in particular locations. Little Paxton should be allowed to accommodate more than 60 dwellings given its proximity to facilities in St Neots.</p>	<p>Godmanchester' as the only location in Godmanchester that is suitable for large scale development.</p> <p>All major developments will need to be supported by appropriate infrastructure.</p> <p>The Settlement Hierarchy deals with windfall development and as such it is considered that moderate scale is appropriate for Lt Paxton. It does not have the full range of services and facilities that are available in St Neots and although it has a good range of services and facilities and has good access to St Neots this does not mean that it can be considered suitable for all scales of development.</p>	<p>CS3 has been amended to state that the scales are indicative, but also allows for proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.</p>
William Evans	WharfLand Investments	Policy Wording 3	383	O	<p>The market towns are unable to sustain the level of development without infrastructure in place. This level of development will be detrimental to character and form of these settlements. Suggest amendments:</p> <p>Huntingdon, St-Neots, "moderate scale may be appropriate to the west of Huntingdon and at RAF Brampton" St Ives and Ramsey and Bury as 'Market Towns' in which development schemes of large, moderate and minor-scale "within urban areas" will be appropriate</p> <p>Add "within urban areas" at the end of the second paragraph.</p>	<p>Most housing development in the towns and key services centres will come from allocations made in the Planning Proposals DPD. The scale and location of these allocations is set out in the Strategic Housing Growth policy. Further housing development will be possible but only on windfall sites within the built up area of the settlements that become available during the plan period and could not be allocated. It is considered that clarification of the issues to be considered when determining the suitability of development should be incorporated. It is considered that this determination of suitability along with the limited nature of sites capable of large scale development becoming available will mean that there is no significant risk of service, facility or infrastructure delivery failure.</p>	<p>None needed.</p>

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr J Stokes	n/a	Policy Wording 3	458	O	Object to inflexible nature of housing development categories which do not take use of land on a site by site basis. This may preclude development on a larger scale in KSC. Additional flexibility is needed.	It is considered that clarification of the circumstances under which exceptions to the development scales would be acceptable and factors that will be taken into account when considering sites should be incorporated into the policy.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option
Martin Page	D.H. Barford (Agent)	Policy Wording 3	575	O	Reference to residential infilling is inflexible and restrictive. It should be replaced with 'small scale development of up to 3 dwellings.'	Clarification of appropriate scales of development will be provided.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Martin Page	D.H. Barford (Agent)	Policy Wording 3	593	O	Policy fails to acknowledge the varying size and range of facilities that are available within the 'smaller settlements' and makes no allowance that some smaller settlements have a role or a focus in serving smaller and poorer served settlements.	With reference to the Settlement Hierarchy Background Paper Gt Gransden is identified as having only a basic range of services and public transport. It is recognised that the village has more employment opportunities than many other villages however it is not considered to fulfil the criteria sufficiently to be considered and designated as a Key Service Centre. Gt Greansden is well placed to fulfil criteria and be considered suitable for minor scale development, whereas Toseland is unlikely to be considered suitable for minor development. It is considered important to have this distinction and tests for development proposals within	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Martin Page	D.H. Barford (Agent)	Policy Wording 3	594	O	No justification for the limit of 9 dwellings for minor scale development. This is restrictive and may preclude sustainable solutions. Change minor to larger to enable a flexible approach to be taken	Clarification of the flexibility for exceptions to the scales identified should be made.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Martin Page	D.H. Barford (Agent)	Policy Wording 3	595	O	Object to term residential infilling. To make best use of land greater flexibility should be incorporated. Change to "small scale development of up to 3 dwellings."	Clarification of the flexibility for exceptions to the scales identified should be made.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Martin Page	D.H. Barford (Agent)	Policy Wording 3	596	O	Great Gransden should be reclassified from Smaller Settlement to a Key Service Centre.	The Settlement Hierarchy background paper identifies the fact that Great Gransden has only a basic range of services and employment opportunities. However it has only a basic public transport service and its proximity to Cambridge would mean that any housing development would add to car based commuting.	None
Chris Blackman	Cambs CC	Policy Wording 3	503	C	In combination with the environmental factors, sustainability should still be a major factor in considering countryside	Development in the countryside should be limited to uses appropriate in such locations. Where development does take place in the countryside, it is accepted	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
					development as accessibility to jobs, education, and various other services is extremely important, especially if the development is of significant size.	that such factors should be taken into account and this is reflected in Policy CS1.	
Wm Morrison Supermarkets	Wm Morrison Supermarkets	Policy Wording 3	538	S	Support	Support noted.	None needed
Mr Roy Reeves	Warboys PC	Policy Wording 3	636	S	Support	Support noted.	None needed
Camvil Developments Ltd	Camvil Developments Ltd	Policy Wording 3	590	S	Support settlement hierarchy but Warboys should be notated in the key diagram with a direction of growth to the west.	Support noted. The Strategic Housing Growth policy identifies locations considered to be suitable for large scale housing development and these locations are then identified on the Key Diagram. As identified in this representation there are sites in Warboys that may be suitable for moderate scale development. Such sites are considered to be too specific to identify in the Core Strategy but may be allocated through the Planning Proposals DPD depending on housing delivery and local requirements.	None needed
Mrs J Daniels	n/a	Policy Wording 3	511	S	Object to inflexible nature of housing development categories which do not take use of land on a site by site basis. This may preclude development on a larger scale in KSC with particular regard to Warboys. Additional flexibility is needed.	It is considered that clarification of the circumstances under which exceptions to the development scales would be acceptable and factors that will be taken into account when considering sites should be incorporated into the policy.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mrs J Loe	n/a	Policy Wording 3	578	S	Distinction between settlements with primary schools and other facilities to support limited growth needed. Amend to: 1. Key service centres – large scale developments of 60 or more developments (Fenstanton, Sawtry and Yaxley) 2. Key service centres – moderate scale development 10-59 dwellings (Buckden, Warboys, Kimbolton and Somersham)* 3. Minor scale development (up to 9 dwellings) All villages with a primary school** 4. Limited development (up to 3 dwellings), all other villages * Brampton, Godmanchester and Little Paxton are included in the urban proposals under policy wording 2. The plan should support limited growth at the villages of Great Paxton, Great Staughton, Great Gransden, Somersham/Colne, Holme, Folksworth, Earith, Great Gidding, Offords, Spaldwick, Needingworth and Brington	Support noted. The suggested hierarchy and development scales are not considered to be appropriate due to likely future population changes (See SHMA) including a significant fall in school aged children. This would mean that allowing minor development in all villages with (only) a primary school would be unlikely to serve the needs of people who are likely to live there.	None, although CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Persimmon Homes (East Midlands) Ltd	Persimmon Homes (East Midlands) Ltd	Policy Wording 3	574	O	The strategy fails to consider the advice PPS1: Planning and Climate Change, PPG13: Transport and paragraph 5.69 of the EEP Panel Report. It is more sustainable to locate development on Greenfield sites that would be well served by the guided busway, rather than locating development on brownfield sites that will inevitably encourage lengthy journeys made by the private car. Major growth proposed for St Neots is not in conformity with the draft RSS. It is unsustainable and	This is not a matter for CS3 and has been adequately considered in the development of CS2 on Strategic Housing Development.  The Preferred Options did not take into account the supplement to PPS1 on Climate Change as this had not then been published. Huntingdon and St Neots are in the Cambridge Sub Region and the whole district is in the London to Peterborough Growth Area. Neither of the towns is identified in the EEP as Key Centres for Development and Change or in any other way is any distinction made between the two.	None needed in respect of this Policy.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr & Mrs Massicks	n/a	Policy Wording 3	572	S	<p>unviable to rely upon the A14 road improvements in order to deliver new housing and employment growth, as is the case in Godmanchester. The future designation of RAF Brampton for housing, employment or mixed use should not be included in the Core Strategy until the lifespan of the base is confirmed. Overall a greater focus for growth should be around the Huntingdon Urban Area.</p> <p>Distinction between settlements with primary schools and other facilities to support limited growth needed. Amend to:</p> <ol style="list-style-type: none"> <li>1. Key service centres – large scale developments of 60 or more developments (Fenstanton, Sawtry and Yaxley)</li> <li>2. Key service centres – moderate scale development 10-59 dwellings (Buckden, Warboys, Kimbolton and Somersham)*</li> <li>3. Minor scale development (up to 9 dwellings) All villages with a primary school**</li> <li>4. Limited development (up to 3 dwellings), all other villages</li> </ol> <p>* Brampton, Godmanchester and Little Paxton are included in the urban proposals under policy wording 2. The plan should support limited growth at the villages of Great Paxton, Great Staughton, Great Gransden, Somersham/Colne, Holme, Folksworth, Earith, Great Gidding, Offords, Spaldwick, Needingworth and Brington</p>	<p>Godmanchester is in broad terms as sustainable as many parts of Huntingdon by virtue of the distance and accessibility to services in Huntingdon town centre. Much of the Strategy is dependant upon delivery of major infrastructure projects such as the A14 improvements.</p> <p>The MoD has confirmed its intention to close RAF Brampton.</p> <p>Support noted. The suggested hierarchy is similar to an option for the settlement hierarchy considered through consultation in preparation of the Core Strategy. The option did not receive much support and the preferred option was considered to be more appropriate.</p>	<p>None, although CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.</p>
Taylor Woodrow Developments Ltd	Taylor Woodrow Developments Ltd	Policy Wording 3	640	O	<p>Fenstanton, Buckden and Warboys should not be designated KSC. They are not in sustainable locations</p>	<p>Only those locations of growth that could accommodate large scale development were considered appropriate to identify in policy wording 2. This does not mean</p>	<p>None needed.</p>

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Adam Ireland	Environment Agency	Policy Wording 3	536	S	Support.	that no allocations of moderate scale will be made. It is considered that these villages have a reasonable range of services and also perform a service function for smaller nearby settlements. It is not considered that there are more appropriate settlements for designation as KSCs.	None needed.
Mr Burgess	n/a	Policy Wording 3	515	S	Support	Support noted.	None needed.
Edwards	n/a	Policy Wording 3	498	O	Support settlement hierarchy but oppose deletion of settlement boundaries. Use of criteria based policy will not provide certainty or clarity for potential new development.	Although the approach to settlement boundaries may lead to less clarity there should be more flexibility and more opportunity for development that responds to local requirements.  The matter of settlement boundaries is not considered to be a strategic issue and is therefore more appropriately dealt with in the Development Control Policies DPD  It is considered that clarification of the circumstances under which exceptions to the development scales would be acceptable and factors that will be taken into account when considering sites should be incorporated into the policy.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Paul Seabrook	Seabrook Farms	Policy Wording 3	630	O	Object to narrow approach of using the hierarchy for only non allocated sites – brownfield or windfall sites. It should instead guide development across the District.	The Settlement Hierarchy will be used in conjunction with the Strategic Housing Growth policy to determine the allocation of sites in the Planning Proposals DPD.	None needed.

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Name	Organisation	Para/Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Blackman	n/a	Policy Wording 3	576	S	<p>Distinction between settlements with primary schools and other facilities to support limited growth needed. Amend to:</p> <ol style="list-style-type: none"> <li>1. Key service centres – large scale developments of 60 or more developments (Fenstanton, Sawtry and Yaxley)</li> <li>2. Key service centres – moderate scale development 10-59 dwellings (Buckden, Warboys, Kimbolton and Somersham)*</li> <li>3. Minor scale development (up to 9 dwellings) All villages with a primary school**</li> <li>4. Limited development (up to 3 dwellings), all other villages</li> </ol> <p>* Brampton, Godmanchester and Little Paxton are included in the urban proposals under policy wording 2. The plan should support limited growth at the villages of Great Paxton, Great Staughton, Great Gransden, Somersham/Colne, Holme, Folksworth, Earith, Great Gidding, Offords, Spaldwick, Needingworth and Brington</p>	<p>Support noted. The suggested hierarchy and development scales are not considered to be appropriate due to likely future population changes (See SHMA) including a significant fall in school aged children. This would mean that allowing minor development in all villages with (only) a primary school would be unlikely to serve the needs of people who are likely to live there.</p>	<p>CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option</p>



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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Day	n/a	Policy Wording 3	573	S	Distinction between settlements with primary schools and other facilities to support limited growth needed. Amend to: 1. Key service centres – large scale developments of 60 or more developments (Fenstanton, Sawtry and Yaxley) 2. Key service centres – moderate scale development 10-59 dwellings (Buckden, Warboys, Kimbolton and Somersham)* 3. Minor scale development (up to 9 dwellings) All villages with a primary school** 4. Limited development (up to 3 dwellings), all other villages * Brampton, Godmanchester and Little Paxton are included in the urban proposals under policy wording 2. The plan should support limited growth at the villages of Great Paxton, Great Staughton, Great Gransden, Somersham/Colne, Holme, Folksworth, Earith, Great Gidding, Offords, Spaldwick, Needingworth and Brington	Support noted. The suggested hierarchy is similar to an option for the settlement hierarchy considered through consultation in preparation of the Core Strategy. The option did not receive much support and the preferred option was considered to be more appropriate.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option
Gates Hydraulics	Gates Hydraulics	Policy Wording 3	501	S	Support.	Support noted.	None needed.
Marlborough Developments Ltd	Marlborough Developments Ltd	Policy Wording 3	528	O	Yaxley should be allocated as a fifth 'spatial planning area' to reflect its close links with Hampton and Peterborough, which have facilities comparable to a market town.	Yaxley has experienced significant development in recent years and has significant existing commitments. While Yaxley does have a good range of services and facilities and good accessibility to higher order services and facilities in Peterborough it does not have the same range of services as a market town. With these issues in mind it is not considered appropriate to designate Yaxley as part of an additional spatial planning area or identify further development locations for the village.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Wadsworth Scott and Burgess	n/a	Policy Wording 3	562	S	We support the identification of Needingworth for limited development	Support noted.	None needed.
Twigden	Twigden Homes	Policy Wording 3	568	S	The identification of Ramsey as a Market Town in Policy Wording 3 is supported.	Support noted.	None needed.
N Lunniss	n/a	Policy Wording 3	563	S	Distinction between settlements with primary schools and other facilities to support limited growth needed. Amend to: 1. Key service centres – large scale developments of 60 or more developments (Fenstanton, Sawtry and Yaxley) 2. Key service centres – moderate scale development 10-59 dwellings (Buckden, Warboys, Kimbolton and Somersham)* 3. Minor scale development (up to 9 dwellings) All villages with a primary school** 4. Limited development (up to 3 dwellings), all other villages * Brampton, Godmanchester and Little Paxton are included in the urban proposals under policy wording 2. The plan should support limited growth at the villages of Great Paxton, Great Staughton, Great Gransden, Somersham/Colne, Holme, Folksworth, Earith, Great Gidding, Offords, Spaldwick, Needingworth and Brington	Support noted. The suggested hierarchy is similar to an option for the settlement hierarchy considered through consultation in preparation of the Core Strategy. The option did not receive much support and the preferred option was considered to be more appropriate.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
De'ath & Flack	n/a	Policy Wording 3	571	S	Distinction between settlements with primary schools and other facilities to support limited growth needed. Amend to: 1. Key service centres – large scale developments of 60 or more developments (Fenstanton, Sawtry and Yaxley) 2. Key service centres – moderate scale development 10-59 dwellings (Buckden, Warboys, Kimbolton and Somersham)* 3. Minor scale development (up to 9 dwellings) All villages with a primary school** 4. Limited development (up to 3 dwellings), all other villages * Brampton, Godmanchester and Little Paxton are included in the urban proposals under policy wording 2. The plan should support limited growth at the villages of Great Paxton, Great Staughton, Great Gransden, Somersham/Colne, Holme, Folksworth, Earith, Great Gidding, Offords, Spaldwick, Needingworth and Brington	Support noted. The suggested hierarchy is similar to an option for the settlement hierarchy considered through consultation in preparation of the Core Strategy. The option did not receive much support and the preferred option was considered to be more appropriate.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Camvil Developments Ltd	Camvil Developments Ltd	Policy Wording 3	622	O	The key diagram should be amended to include development potential at London Road, St Ives. St Ives is capable of accommodating more than 500 dwellings. Object to policy wording 3.	Flood risk is a significant issue to the south and east of St Ives and this precludes it being identified as a strategic location for growth. Sites that are suitable for moderate development may be allocated through the Planning Proposals DPD in line with the settlement hierarchy.	None needed.
Mr T Smith	n/a	Policy Wording 3	651	S	Support.	Support noted.	None needed.
Mr S Ross	n/a	7.15	102	S	Key service centres with the greatest potential should be recognised and allocated a greater quantum of development.	A greater level of growth in the Strategic Housing Growth policy would not be consistent with the approach of locating major development in sustainable locations. Further sites, on a more	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Peter Glazebrook	HallamLand Management	7.15	396	S	Although the classification of Kimbolton as a Key Service Centre is supported, the background evidence indicates that it is a significantly more sustainable settlement than other Key Service Centres with a comparable score and should be recognised as such.	modest scale may be allocated through the Planning Proposals DPD and determined by the settlement hierarchy but also will be dependant on whether there are deliverable or developable sites.  Although Kimbolton may be more sustainable than some Key Service Centres it should be recognised that the Strategic Housing Growth policy identifies locations considered to be suitable for large scale development. Further sites that may be allocated through the Planning Proposals DPD will be determined by the settlement hierarchy but also will be dependant on whether there are deliverable or developable sites.	None needed.
Persimmon Homes	Persimmon Homes	7.15	545	O	Recommend that Hemingofrd Grey is included as a key service centre on the basis of its good public transport links and access to a range of facilities within the village and nearby St Ives.	With reference to the settlement hierarchy background paper Hemingford Grey is identified as having a basic range of services and only a basic public transport service. It is therefore not considered appropriate to designate Hemingford Grey as a Key Service Centre.	None needed.
Mr Steven Harvey	n/a	7.16	200	O	Object to Policy P3 and to the tight restrictions placed by the settlement hierarchy on new development in the smaller rural settlements.	The development in Smaller Settlements is limited to residential infilling but Policy CS3 should be amended to make it clear that larger scale development may be acceptable where it is the most sustainable option.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option

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Table 17

Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Ian Burns	Cambs PCT	7.19	179	C	<p>Agree with comments from Hinchingbrooke HCT. All NHS employers in the Hunts area should be notified of relevant housing schemes for which key worker staff might be eligible etc.</p> <p>Affordable homes should not be sited on less valuable land to reduce financial impact on the Developer.</p>	How sites are developed is determined through the development control process. The distribution of affordable housing in a site is not a strategic issue to be covered by the Core Strategy.	None needed
Church Commissioners	Church Commissioners	Policy Wording 4	16	O	The threshold of 3 in the smaller settlements is too low. Further evidence is required to support the imposition of this.	Reference to evidence backing up the use of 3 as the threshold for smaller settlements should be included.	The reasoned justification for this policy has been strengthened.
Mr Michael Palmer-Asplin	n/a	Policy Wording 4	29	O	There is an inconsistency between Policies 4 and 10 for factors to be determining the level of affordable housing on a site. Policy 4 should expressly state that infrastructure requirements and other developer contributions will be taken into account when determining the level of affordable housing to be provided or of contributions sought in lieu, in order to maintain reasonable site viability.	The Infrastructure Requirements policy will be revised. Wording of both policies will be considered carefully in order to remove inconsistencies.	The policy has been amended to take these factors into account.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Maydo Pitt	GO-East	Policy Wording 4	39	O	Should include a policy(s) which reflects all, or at least some of the following requirements of PPS3, and (if not all) a commitment in the policy that the rest of the requirements will be set out in an LDD: - set separate targets for social-rented and intermediate affordable housing where appropriate; - specify the size and type of affordable housing; - set out the approach to seeking developer contributions to facilitate the provision of affordable housing.  Should provide an indication of the criteria (or at least where they will be set out) for conditions or other material considerations which may affect the amount of affordable housing.	Comments noted. Additional detail will be included in the revised policy.	The policy has been amended to take these factors into account.
Gareth Ridewood	CPRE	Policy Wording 4	84	S	Support - need to provide the maximum number of affordable units that is possible.	Support noted.	None needed.
Mr S Ross	n/a	Policy Wording 4	107	O	PPS 3 sets out the minimum threshold for the provision of affordable housing as 15 dwellings. LPAs can set lower levels but this has to have regard to viability and practicability considerations. The draft provides no evidence to substantiate the use of a lower threshold which must be fully justified.	Reference to evidence supporting the use of thresholds lower than 15 homes should be included.	The reasoned justification for this policy has been strengthened.
Mr David England	n/a	Policy Wording 4	112	O	The level of affordable housing required for all housing development should be reduced to 35% in accordance with the emerging East of England Plan.	It is clearly unviable to seek lower/no thresholds as 3 dwellings is effectively no threshold but reducing thresholds in urban areas would not overly increase the amount of affordable housing achieved. The 40% target is supported by assessments of need, references to which will be made more explicit in the submission Core Strategy. Clarification of the application of threshold should be given in updated SPD.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Gareth Ridewood	CPRE	Policy Wording 4	235	S	Where ever possible Affordable Housing should be sought on site to promote inclusive communities. Exceptions sites should only include affordable housing which remains so in perpetuity.	Support noted.	None needed.
National Grid Property Ltd	National Grid Property Ltd	Policy Wording 4	288	S	The inclusion of site specific considerations to be taken into account in determining the appropriate level of housing provision is supported, and should be retained.	Support noted.	None needed.
Mr Steven Harvey	n/a	Policy Wording 4	203	O	There is no clear definition of 'affordable housing'. No evidence of a growing gap between average earnings and housing costs, a limited supply of new affordable properties and the loss of existing social housing through 'right to buy' / 'right to acquire' provisions . No evidence that RSS targets (35%) are too low and no justification for using 40%. No evidence that it is viable and practical to set a significantly lower threshold (3 dwellings) for affordable housing in rural areas. Why is this lower threshold not viable and practical throughout the district?	The PPS3 definition of affordable housing is considered sufficiently clear for the purposes of this DPD. There is no local variation required.	The supporting text has been amended to make it clear that the definition of affordable housing is that set out in PPS3.  The reasoned justification for this policy has been strengthened.
Mr David Reavell	O&H Properties	Policy Wording 4	212	O	The affordable housing requirement is inappropriate in that it requires larger schemes to compensate for developments which do not reach the affordable housing provision threshold.	The RSS says "At the regional level, delivery should be monitored against the expectation that some 35% of housing coming forward as a result of planning permissions granted after the adoption of the RSS are affordable." It says nothing about small sites. It is therefore reasonable to assume that this refers to all sites and that higher thresholds are expected if thresholds mean that some sites do not contribute. The percentage sought is more than justified by assessed housing need.	None.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Paul Ryan	Stukeleys PC	Policy Wording 4	242	S	The Parish Council supports requirements should be affordable.	Support noted.	None.
Paul Ryan	Stukeleys PC	Policy Wording 4	243	O	The Parish Council objects to the proposal that this should apply to 3 or more dwellings in all <i>parishes</i> with less than 3,000 population. Many <i>villages</i> have a small population but are in combined parishes. Future reforms will see more villages combined in this way which could take the combined population over 3,000. The policy should therefore refer to <i>villages</i> not <i>parishes</i> , consistent with Policy Wording 5 which refers to "settlements" as a "small rural community".	<b>It is more appropriate to consider the size of the settlement. The policy can therefore be amended to refer to all smaller settlements as defined by the settlement hierarchy.</b>	The policy has been amended to refer to smaller settlements as defined by the settlement hierarchy.
Martin Leyland	Barratt Strategic	Policy Wording 4	226	O	The affordable housing requirement is inappropriate in that it requires larger schemes to compensate for developments which do not reach the affordable housing provision threshold.	The RSS says "At the regional level, delivery should be monitored against the expectation that some 35% of housing coming forward as a result of planning permissions granted after the adoption of the RSS are affordable." It says nothing about small sites. It is therefore reasonable to assume that this refers to all sites and that higher percentages are expected if thresholds mean that some sites do not contribute. The percentage sought is more than justified by assessed housing need.	None.
Mr Peter Glazebrook	HallamLand Management	Policy Wording 4	393	O	Inadequate justification for setting a target of 40% for affordable housing. It is not acceptable to state that 35% is the average for the region, as set out in the East of England Plan, and therefore to achieve this figure a higher percentage must be sought because this approach has no regard to any local assessment of affordable housing A Strategic HMA is currently being undertaken and will inform the latter stages of the Core Strategy's preparation and it is not acceptable to fix a target of 40% ahead of its evidence.	It is acknowledged that the Preferred Options did not make direct reference to the full range of evidence supporting the 40% target for affordable housing in the policy or supporting text however the evidence was referenced in Volume 2. Clarification of the supporting evidence should be made in the supporting text. Clarification of the policy to include detail about priorities and form contributions should take.	The reasoned justification has been strengthened, in particular to include reference to the SHMA.



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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr John Scott	Stamford Homes Ltd	Policy Wording 4	402	O	<p>Inadequate justification for setting a target of 40% for affordable housing. It is not acceptable to state that 35% is the average for the region, as set out in the East of England Plan, and therefore to achieve this figure a higher percentage must be sought because this approach has no regard to any local assessment of affordable housing A Strategic HMA is currently being undertaken and will inform the latter stages of the Core Strategy's preparation and it is not acceptable to fix a target of 40% ahead of its evidence.</p> <p>There must be adequate scope for negotiation on economic viability taking into account other infrastructure requirements. Object to the statement that criteria "will set out the priorities for achieving affordable housing" and "be set for the form the contribution should take and the circumstances in which these may be varied." These should be specified in the policy.</p>	<p>It is acknowledged that the Preferred Options did not make direct reference to the full range of evidence supporting the 40% target for affordable housing in the policy or supporting text however the evidence was referenced in Volume 2. Clarification of the supporting evidence should be made in the supporting text. Clarification of the policy to include detail about priorities and form contributions should take.</p>	<p>The reasoned justification has been strengthened, in particular to include reference to the SHMA. The policy includes clear reference to other LDDS which will provide more detail on priorities and the form of contributions.</p>
Mrs Madeleine Liddiard	Godmanchester TC	Policy Wording 4	340	S	Support	Support noted.	None needed.
Lands Improvement	Lands Improvement	Policy Wording 4	357	S	Support the target of 40% affordable housing the allowance for contamination costs which may affect the provision of affordable housing. It is important for delivery that schemes are viable and a policy should be flexible.	Support noted.	None needed.

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Name	Organisation	Para/Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
William Evans	WharfLand Investments	Policy Wording 4	382	C	The suggested wording of policy 4 is supported on the basis that the draft policy generally complies with Government's policy direction towards providing an increased level of affordable housing as part of mixed use developments. Wharf generally supports the thresholds cited within the draft policy. The Council's overall approach appears consistent with PPS3 and Circular 01/08 and therefore consistent with PPS12 tests of soundness (iv).	Support noted.	
Martin Page	D. H. Barford (Agent)	Policy Wording 4	611	O	The increase from 29% in 'saved' policy AH4 of the Local Plan Alteration 2002 to 40% is not justified when the Housing Needs Survey identifies the quantum of affordable need has reduced substantially since 2002. It will compound the shortfall in the supply of private market units, which in turn will fuel an increase in property values and exacerbate the affordability difficulties. There will not be adequate funding to deliver 40% affordable housing units. The affordable housing requirement should be retained at 29%. The threshold for affordable housing on smaller developments should be increased to schemes of 6 or more units.	In identifying that the affordable housing requirement has reduced from the 2002 survey to the 2006 update the consultee also identifies that fact that the yearly requirement is still more than the total housing requirement from the EEP for all housing. It is therefore reasonable to set the target as high as possible, taking into account relevant information about viability etc. The Council's waiting list has reduced in recent years, however at the current rate of reduction of about 180 per year it will take over 11 years to clear this waiting list. The Structure Plan policy P9/1 established the 40% target a number of years ago. The Structure Plan Policy was supported by the Cambridge Sub-regional Housing Needs Survey 2003. Additionally the SHMA supports this approach. It is therefore considered that a target of 40% is supported by robust evidence. Additionally the arguments put forward for a lower target in Huntingdonshire than the rest of the Cambridge sub-region could justify a consistent approach.	None.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Persimmon Homes	Persimmon Homes	Policy Wording 4	547	O	There will need to be flexibility in the consideration of individual sites especially in settlements with less than 3000 and 40% should not be seen as a target. The affordable housing threshold of 3 or more homes will discourage small scale housebuilders from utilising sites in settlements of less than 3000 population and will be detrimental to their vitality. This threshold should be amended. We recommend the following wording for less than 3000 population parishes: "on proposals of 5 or more homes or 0.16ha, in all parishes with less than 3000 homes."	It is not clear how the consultee considers the settlement hierarchy to be relevant to this policy. Although it is acknowledged that the threshold for rural areas may impact upon the number of small sites coming forward the housing trajectory will not be affected by this threshold. There will be no impact because housing requirements from the EEP will be accommodated in locations identified in the strategic housing growth policy and will not be dependant on delivery from other locations.	None.
Persimmon Homes (East Midlands) Ltd	Persimmon Homes (East Midlands) Ltd	Policy Wording 4	580	S	We agree with the provision of affordable housing identified by Policy Wording 4 but the level of affordable housing required has been based on an up to date, robust strategic housing market assessment and other surveys that assess the local need. If the HDC fail to do to complete these surveys, the affordable housing requirement may be found unsound as the evidence base	Support noted. It is acknowledged that the Preferred Options did not make direct reference to the full range of evidence supporting the 40% target for affordable housing in the policy or supporting text. Of which the SHMA is only in draft form. However the evidence was referenced in Volume 2. Clarification of the supporting evidence should be made in the supporting text.	None needed.
Gates Hydraulics	Gates Hydraulics	Policy Wording 4	502	O	We generally support the principle that affordable housing should be provided in new developments. However, the 40% target for the provision of affordable housing is too high as:  -it is not in conformity with the RSS which sets a target of 35% across the East of England  - it could dampen demand from housebuilders and reduce supply thus worsening affordability problems  - could adversely affect quality or other infrastructure requirements	It is acknowledged that the Preferred Options did not make direct reference to the full range of evidence supporting the 40% target for affordable housing in the policy or supporting text however the evidence was referenced in Volume 2. It is considered that the evidence supports a 40% target. The Council has sought 40% in the Cambridge sub-region for sometime now and so arguments about viability due to land costs are only valid outside of the sub-region, whoever the Council should not have to accommodate developers who have paid too much	The reasoned justification has been strengthened, in particular to include reference to the SHMA

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Marlborough Developments Ltd	Marlborough Developments Ltd	Policy Wording 4	529	O	<p>The affordable housing requirement is inappropriate in that it requires larger schemes to compensate for developments which do not reach the affordable housing provision threshold.</p>	<p>for land. Clarification of the supporting evidence should be made in the supporting text.</p> <p>The RSS says "At the regional level, delivery should be monitored against the expectation that some 35% of housing coming forward as a result of planning permissions granted after the adoption of the RSS are affordable." It says nothing about small sites. It is therefore reasonable to assume that this refers to all sites and that higher thresholds are expected if thresholds mean that some sites do not contribute. Percentage sought is more than justified by assessed housing need.</p>	None needed.
Twigden	Twigden Homes	Policy Wording 4	569	O	<p>Policy Wording 4 which identifies a 40% affordable housing requirement without sufficient evidence.</p>	<p>It is acknowledged that the Preferred Options did not make direct reference to the full range of evidence supporting the 40% target for affordable housing in the policy or supporting text however the evidence was referenced in Volume 2. Clarification of the supporting evidence should be made in the supporting text.</p>	<p>The reasoned justification has been strengthened, in particular to include reference to the SHMA</p>
Martin Page	D.H. Barford (Agent)	7.22	616	O	<p>Huntingdonshire has the third lowest house price to income ratio in the East of England region, which indicates housing in Huntingdonshire is more affordable than most of the region. Given the RSS Panel's recommendation for an overall average 35% affordable provision across the region and the expectation provision will be higher in areas of greater need, it is reasonable that the</p>	<p>Information attached shows that Huntingdon has the 3rd lowest income to property price ratio in Cambridgeshire, not the East of England. This therefore is not as significant as the consultee implies. Without information about standard deviation it is impossible to tell whether the relatively high average income in the district is due to a small number of high earners or genuinely higher pay.</p>	<p>The reasoned justification has been strengthened, in particular to include reference to the SHMA</p>

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Steven Harvey	n/a	7.24	206	O	<p>affordable housing provision in Huntingdonshire is less than 35% and close to 30%.</p> <p>The proposal to increase the level of affordable housing provision from 29% in 'saved' policy AH4 of the Local Plan Alteration 2002 to 40% is not justified when the Housing Needs Survey identifies the quantum of affordable need has reduced substantially since 2002.</p> <p>The proposed strategy will compound the shortfall in the supply of market units, which in turn will fuel an increase in property values and exacerbate the affordability difficulties. The affordable housing requirement should be retained at 29%.</p>	<p>In identifying that the affordable housing requirement has reduced from the 2002 survey to the 2006 update the consultee also identifies that fact that the yearly requirement is still more than the total housing requirement from the EEP for all housing. It is therefore reasonable to set the target as high as possible, taking into account relevant information about viability etc. The Council's waiting list has reduced in recent years, however at the current rate of reduction of about 180 per year it will take over 11 years to clear this waiting list.</p> <p>The Structure Plan policy P9/1 established the 40% target a number of years ago. The Structure Plan Policy was supported by the Cambridge Sub-regional Housing Needs Survey 2003.</p> <p>Additionally the SHMA supports this approach. It is therefore considered that a target of 40% is supported by robust evidence. Additionally the arguments put forward for a lower target in Huntingdonshire than the rest of the Cambridge sub-region could justify a consistent approach.</p>	
					<p>- not substantiated by evidence of need:</p> <ul style="list-style-type: none"> <li>- no mechanism as mentioned in para 7.24</li> <li>- how will the Core Strategy ensure that sufficient land is brought forward to meet the RSS targets?</li> </ul> <p>Para 7.24 suggests that 'the exceptions process is well established' without evidence that it actually works and can be relied on to deliver the high level of affordable housing required</p>	<p>Evidence of affordable housing need is identified in Volume 2.</p> <p>The mechanism is provided by the higher than agricultural land value associated with affordable housing. The policy deals with rural exceptions. Other policies identify sufficient locations to meet the EEP housing requirements.</p>	<p>The reasoned justification has been strengthened, in particular to include reference to the SHMA</p>

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Church Commissioners	Church Commissioners	Policy Wording 5	17	S	<p>- Support the policy allowing for rural exception sites for affordable housing, but suggest they could contain an element of market housing, even if minimal, in order to cross-subsidise the affordable housing to create a greater incentive for the landowner and produce sites where the affordable housing is built and can just be 'passed over' to the RSL.</p> <p>- Should allocate specific rural exception sites as well as encouraging them through the Core Strategy for unallocated sites</p>	The Council does not believe that it is appropriate to allocate specific sites for affordable housing and that it is more appropriate to respond to local housing need in rural areas in a more flexible manner. It is not considered appropriate to allow some proportion of exceptions sites to be standard market housing.	None needed.
Maydo Pitt	GO-East	Policy Wording 5	40	O	Wording simply repeats PPS3, paragraph 30. Should be amended to make it locally specific. Alternatively, a statement that the Authority intends to rely on PPS3, paragraph 30, in relation to this matter would suffice.	Comments noted. The policy needs to be specific to the area.	The policy has been amended so that it now refers to the settlement hierarchy specific to Huntingdonshire
Tom Gilbert-Wooldridge	English Heritage	Policy Wording 5	123	C	Add criterion that affordable housing development will only be acceptable if the impact on the historic, built and natural environment is acceptable.	Impact on the historic, built and natural environment will be covered by policies in the Development Control DPD.	None needed.
Mr S Ross	n/a	Policy Wording 5	109	O	The use of the word 'within' in the first sentence of the policy is unnecessary because if a site is located within an existing built up area there should be no objection in principle to its development or redevelopment.	Disagree. A proposal for affordable housing within the built-up area may be of a larger scale than would be permitted for market housing	None needed.
Milton (Peterborough) Estates Ltd	Milton (Peterborough) Estates Ltd	Policy Wording 5	190	S	Support the provision of affordable housing on sites within or adjacent to the built up area of smaller settlements and the criteria. Affordable family housing should be limited to villages which have at least a food shop and primary school. Other types of affordable housing should be supported wherever a need can be substantiated. This is consistent with PPS3 paragraph 30 which seeks to ensure that sustainable rural communities are supported.	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Gareth Ridewood	CPRE	Policy Wording 5	236	S	Where ever possible Affordable Housing will be sought on site to promote inclusive communities. Exceptions sites should only include affordable housing which remains so in perpetuity.	Support noted.	None needed.
D R Juggins	n/a	Policy Wording 5	391	S	Support the provision of affordable housing on sites within or adjacent to the built up area of smaller settlements and the criteria. Affordable family housing should be limited to villages which have at least a food shop and primary school. Other types of affordable housing should be supported wherever a need can be substantiated. This is consistent with PPS3 paragraph 30 which seeks to ensure that sustainable rural communities are supported.	Support noted. It is considered appropriate to require a basic range of services appropriate to the type of housing in order to ensure that some level of sustainability.	None needed.
Paul Seabrook	Seabrook Farms	Policy Wording 5	631	O	- Support the policy; exception sites should be identified in the Planning Proposals DPD. However a number of Key Service Centres and small settlements suffer from a shortage of affordable housing and under the settlement hierarchy they will not receive any new development to trigger affordable housing provision to meet the need. - An up to date Housing Needs Assessment is needed to identify the shortages. In Kimbolton the previous assessment, supported by the Parish, showed a need for affordable housing, but infill and the lack of allocations meant that this need was not met. - Retirement Housing is not now identified as a key objective but it is becoming more important with the ageing population. Retired people downsizing can release family housing but often cannot find suitable accommodation	It is not considered appropriate to allocate affordable housing sites through the Planning Proposals DPD. There are numerous problems with this approach, not least of all that land owners may seek standard market housing. It is considered that the plan should respond to local housing need in rural areas in a flexible manner permitting suitable sites as and when necessary based on local housing need.	None needed.
Miss Katie Ruff	Somersham in Action	7.26	19	C	As a result of considering a Gypsy & Traveller planning application at Somersham the Group welcome opportunity of taking part in this consultation process criteria, as they can contribute to the policies, which in turn will help the council, travellers and local residents.	Noted	Note for preparation of Gypsy & Traveller Sites DPD.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Maydo Pitt	GO-East	7.26	70	C	Reference to Circular 01/06 needs to be updated to refer to 'Planning for Travelling Showpeople' Circular 04/07.	The reference will be updated.	The reference to Circular 04/07 has been included.
Ian Burns	Cambs PCT	7.26	180	S	Welcome commitment to developing further accommodation for the Gypsy and Traveller communities in line with Government policy as they experience some of the poorest health outcomes in the local population and appropriate accommodation is a major contributor to ensuring good health and wellbeing.	Support noted.	None needed.
Miss Katie Ruff	Somersham in Action	7.29	20	S	Agree that 15 – 25 additional pitches is reasonable and that HDC is required to find sites to accommodate them. However, there is a need to adopt more specific criteria in consultation with stakeholders.  Temporary planning permissions should not be granted in unsuitable locations as it is not a long term solution to the problems of site provision (see report by independent task group headed up by Sir Brian Briscoe, looking at site provision and enforcement for gypsies and travellers.)	Support noted. The development of more detailed criteria to assist in the identification of sites is also a matter for the specific DPD. However, additional criteria can be set out in the Core Strategy policy as suggested in response to objections. When considering granting temporary planning permission, the Council would not grant permission where the site was clearly inappropriate.	The policy has been amended to include additional criteria
Miss Katie Ruff	Somersham in Action	Policy Wording 6	21	C	There should be a set of specific and secondary criteria for gypsy and traveller sites to enable all parties to be clear of the boundaries of establishing a traveller site. It would also be a fairer process to use a consultation process to select possible sites and give alternative options. Temporary permissions should not be given where they do not meet the set criteria and are not suitable for long term provision. Have suggested additional criteria for the policy:  - should not impact materially on the amenities of any residential property	The criteria set out in the Core Strategy will be at an appropriate level. The site specific DPD on Gypsy & Traveller sites may develop more detailed criteria to identify sites. This would be the subject of a more focussed consultation with stakeholders and this will also include exploring different site options.  Agree that some additional criteria should be included to cover the need to take account of the settlement hierarchy and the needs of Gypsies, Travellers and Travelling.	The policy has been amended to include additional criteria.



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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
					<ul style="list-style-type: none"> <li>- no part of a site should abut a residential property</li> <li>- should be no impact on neighbouring businesses</li> <li>- movement of vehicles to and from site should not cause disturbance to neighbouring properties / operations</li> <li>- take account of impact on landscape</li> <li>- should be within reasonable distance of education and health services and shops</li> <li>- should allow plenty of space for the caravans on chosen sites and take into account parking and suitable access roads, ensuring essential highway safety for vehicles. Have tested the possible criteria on a potential site in the Huntingdon area.</li> </ul>	<p>However, it is considered that the existing criteria cover the impact on nearby dwellings and businesses. In any criteria there will be a judgement that will have to be made. It is agreed that all criteria should look to the needs of both the Travelling and Settled communities.</p> <p>All planning applications are visited by planning officers in order to make a judgement before a decision is reached.</p>	
Maydo Pitt	GO-East	Policy Wording 6	41	O	<p>Welcomes the inclusion of a policy wording relating to gypsy and traveller sites but consider wording does not fully reflect the requirements of Circular 01/2006, paragraph 31, which requires policies to set out the criteria for the location of gypsy and traveller sites which will be used to guide the allocation of sites. The current policy has an emphasis around amenity impacts on the surroundings rather than wider locational considerations. For instance, there is no consideration of location relative to the settlement hierarchy which reflects the sustainability of settlements on the basis of facilities and services provided and which would need to be accessed by the travelling community as well as the settled community.</p>	<p>Agree that some additional criteria should be included to cover the need to take account of the settlement hierarchy and the needs of Gypsies, Travellers and Travelling Showpeople.</p>	<p>The policy has been amended to include additional criteria, including reference to the settlement hierarchy.</p>
P Bryant	Somersham PC	Policy Wording 6	92	O	<p>The Parish Council supports the representation made by residents on Gypsies and Travellers as the current criteria is not precise enough.</p>	<p>Agree that some additional criteria should be included to cover the need to take account of the settlement</p>	<p>The policy has been amended to include additional</p>

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Tom Gilbert-Wooldridge	English Heritage	Policy Wording 6	124	C	An additional criterion could be included to state that the provision of a site will only be acceptable if the impact on the historic, built and natural environment is acceptable.	hierarchy and the needs of Gypsies, Travellers and Travelling Showpeople.  This would be covered by policies in the Development Control DPD and is also set out in Government guidance both of which apply to all development.	criteria, including reference to the settlement hierarchy  None needed.
Ian Burns	Cambs PCT	Policy Wording 6	181	S	Endorses the importance of sites being within walking and cycling distance or having good public transport links to education and health services.	Support noted.	None needed.
Ian Burns	Cambs PCT	Policy Wording 6	182	O	The health and safety aspects of the criteria should include 'wellbeing' and to reflect the wording in the original option to include avoiding areas with an unacceptable noise constraint eg areas adjacent to trunk roads.  Amend the last bullet point of the criteria to read: the health, safety and wellbeing of occupants are not put at risk including through unsafe access to sites, poor air quality and unacceptable noise (as for example close to trunk roads) and unacceptable flood risk the quality of the environment is at the same acceptable standard that would be expected when planning for the settled community	Agree this can be added to refine the criteria	The policy has been amended to include these points.
Mrs Madeleine Liddiard	Godmanchester TC	Policy Wording 6	341	S	Support.	Support noted.	None needed.

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Table 18 Representations received on policy wording 7 land for employment development.

Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Chris Blackman	Cambs CC	7.33	477	S	The aim of a 'low carbon future' for employment is supported, in accordance with the RES.	Support noted.	None needed.
Strawsons Devt t/a Omnivale	Strawsons Devt t/a Omnivale	7.34	558	O	Amend as follows: at 7.34: "Additional provision is made in the Ramsey Spatial Planning Area to aid regeneration, to reduce local unemployment and under-employment, to reduce out-commuting and to support the creation of a balanced community by complementing the planned growth in homes." In the policy: "In Ramsey Spatial Planning Area where at least 8 hectares of land, of which at least 6 hectares will be on previously developed land, will be provided in the following locations: In a mixed use redevelopment for B1, B2 and complementary uses which also employment to the west and north of Ramsey, notably on former RAF Upwood."	Although it is acknowledged that RAF Upwood is an important redevelopment opportunity in the Ramsey area, it is not considered appropriate to identify specific sites in the Core Strategy. It is the Council's intention to have employment led regeneration in the Ramsey area. For this a balance between jobs and housing is considered necessary. As the Core Strategy identifies the problems of accessibility it is considered appropriate to limit development.	Submission plan amended including amendments to policy CS7 and reasoned justification.
R W Dew and Son Ltd	R W Dew and Son Ltd	Policy Wording 7	13	O	Should include wording to support small scale employment development in villages, especially key service centres	It is not considered appropriate to identify locations for all scales of development in the Core Strategy in order to maintain its strategic nature. The strategy does not preclude small scale economic development in Key Service Centres or smaller settlements. Clarification in the supporting text that small scale economic development will be supported in KSCs should be considered.	Submission plan amended including amendments to policy CS7 and reasoned justification.
Church Commissioners	Church Commissioners	Policy Wording 7	18	O	Supports the inclusion of south-east/east Godmanchester as a location for mixed-use development and promote Rectory Farm in this area. The relationship of the Core Strategy with the Huntingdon West AAP needs to be clarified. All the areas referred to in the AAP should be given further consideration, especially land at Thrapston Road, Brampton. Settlements outside of the	While it is not appropriate to identify specific sites in the Core Strategy the Rectory Farm site was considered as part of the SHLAA. The sites allocation would not be precluded by the identification of major locations for employment development in the Core Strategy, although detailed consideration would be necessary in preparation of the Planning Proposals DPD.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Michael Palmer-Asplin	n/a	Policy Wording 7	30	O	Insufficient employment land has been allocated to the St Ives area, given its not particularly good workforce:jobs ratio. Sites are available in the Compass Point/Gifford's Farm area east of the town unaffected by flood risk.	With reference to the employment sites identified in this representation it was considered that these were clearly part of the built up area of St Ives. Vol 2 reported a summary of consultations and further discussion with the Environment Agency. The SHLAA identified flood risk as a constraint but also identified other constraints that together meant that this site was not considered suitable for housing development.	None needed.
Russell Saywell	n/a	Policy Wording 7	46	O	Little Paxton is included in the St Neots Spatial Planning Area for housing purposes and should also be linked to St Neots for employment potential. A number of brownfield redevelopment opportunities exist in Lt Paxton.	The approach taken with Lt Paxton in the two policies is considered to be inconsistent. The approach taken in the employment policy is considered to be correct as Lt Paxton is not considered to be suitable for large scale development of either employment or housing. With this in mind the reference to Lt Paxton accommodating a small amount of housing in the Strategic Housing Policy will be removed.	Submission plan amended including amendments to policy CS2 and reasoned justification.
Geoff Keeble	Highways Agency	Policy Wording 7	54	S	It is unclear how the Preferred Approach will limit levels of out commuting, however this policy is supported.	Support noted	None needed.
Alison Melnyczuk	St. Ives TC	Policy Wording 7	158	S	The plan to maintain the status quo in St Ives regarding Employment Land is seen as sensible.	Support noted.	None needed.
Tom Gilbert-Woolbridge	English Heritage	Policy Wording 7	125	O	The policy wording is detailed in terms of where employment land will be provided, but the supporting text does not explain how these locations have been identified. The policy and supporting text lack reference to the potential environmental impacts of development. It has not been possible to assess the locations for impact on the historic environment. It is highly likely that	Due to the strategic nature of the Core Strategy only locations for major development are identified. Site specific details of allocations will be decided through the Planning Proposals DPD.	Submission plan revised to to explain how and why locations for major development have been identified in

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
					the historic environment will be affected in each location. Site specific assessments should be carried out.		the reasoned justification of CS7. Appendix 1 of Volume 2 also includes an assessment of the potential impacts relating to the strategic highway network.
Mr S Ross	n/a	Policy Wording 7	111	O	The allocation of 2ha of employment land at Yaxley is welcome. Its location should be determined through a Site Allocations DPD not through the core strategy. Land to the southwest of Yaxley could accommodate employment development just as well as land to the northeast.	The Core Strategy does not identify specific sites. Specific sites will be determined through the Planning Proposals DPD.	Submission plan amended including amendments to policy CS7 and reasoned justification.
Gareth Ridewood	CPRE	Policy Wording 7	239	C	Policy needs greater clarification as to where the development is proposed, especially in relation to Huntingdon, North West of the town, Brampton, and Godmanchester. A map would have provided greater clarification. Also no mention of the environmental constraints.	The Core Strategy should not identify specific sites only locations for development. It is considered that the descriptions of the locations in conjunction with the key diagram provide the appropriate level of detail. Specific sites for allocation will be determined in drawing up the Planning Proposals DPD.	None.
Mr Matthew Stock	Redrow Homes (South Midlands) Ltd	Policy Wording 7	289	O	A low carbon future scenario should not be adopted as a basis for planning for employment land provision. It is unrealistic and cannot be relied upon to ensure the delivery of future economic growth and new jobs as envisaged by the RSS. Policy Wording 7 should be amended to increase the amount of employment land to be provided to reflect a more trend based approach of higher provision. The locational distribution is flawed. More land should be identified in St Ives recognising its future sustainable transport links. Land away from the flood plain which would not cause unacceptable local levels of flood risk should	Disagree. The ELR concludes that a low carbon scenario is the most sustainable and that the level of additional land required set out in the Preferred Options is appropriate. The majority of this land should be directed to areas where most housing growth is to take place ie Huntingdon Spatial Planning Area and St Neots Spatial Planning Area.	None.

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Ian Burns	Cambs PCT	Policy Wording 7	183	C	<p>be identified. At least 8 hectares of greenfield land should be provided for employment uses in the St Ives Area as part of a north-eastern extension to the town at Gifford's Farm.</p> <p>Employment is important as a pathway to learning and skills development. The Hunts Personal and Community Development Skills Partnership should be consulted to ensure the appropriateness of the proposals.</p>	<p>The suggested consultee will be included for the submission stage of the Core Strategy.</p>	<p>No amendments to the Submission plan needed.</p>
Mr Steven Harvey	n/a	Policy Wording 7	210	O	<p>We object to Policy P7 as it will have a negative impact on the long term survival of existing rural communities and will discourage the regeneration of potentially sustainable communities outside the main urban centres.</p>	<p>The Preferred Option only identifies large scale employment development locations in accordance with the strategic nature of the Core Strategy. Local employment opportunities will be supported. The Development Control policies DPD will detail supportive policies dealing with local employment opportunities, however waste recycling is not considered to be a subject that requires local specification as it is covered by Cambs CC in their Minerals and Waste LDF.</p>	<p>None.</p>
Mr David Reavell	O&H Properties	Policy Wording 7	215	O	<p>The allocation of 2ha of employment for Yaxley is not strategic in scale and should not be considered as part of the Core Strategy. This should come forward as an allocation in the Site Allocations DPD. The scale of growth proposed continues the piecemeal development of Yaxley which offers no wider benefits to the settlement.</p>	<p>The identification of locations for employment development will be clarified; however the overall scale of development for Yaxley is considered to be appropriate.</p>	<p>Submission plan amended including amendments to policy CS7 and reasoned justification.</p>
Paul Ryan	The Stukeleys PC	Policy Wording 7	244	O	<p>The Council objects to the proposal to provide employment land to the north west of Huntingdon due to increased traffic through the villages of Gt &amp; Lt Stukeley, impact on environmental amenity, likelihood of severance and erosion of the green separation between Great Stukeley and Huntingdon. Development of large buildings would be highly visible on the slope destroying this important approach to Huntingdon.</p>	<p>The Alconbury Airfield was considered at the EEP EIP and it was concluded that its future should be decided in the next RSS. As the Core Strategy will be reviewed well before the end date of the current plan period and most likely shortly after the review of the RSS the future of Alconbury will be determined within this plan period. Huntingdon is the main focus</p>	<p>None.</p>

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
					<p>The balance of employment land proposed for Huntingdon and St Neots is not appropriate. Huntingdon has more jobs than resident workers. St Neots is more of a dormitory town and needs a rebalancing of its housing/jobs ratio, particularly with the urban extension to the east of the town. No account is taken of the potential for employment growth at Alconbury Airfield. It is unacceptable to allocate greenfield land in the Plan when there is such a reserve of land. Consultation on the Employment Land Review was limited to land-owners, developers and business interests. The Council was not consulted and its views have not been taken into account. If greenfield employment development at Huntingdon is required, this is not the best location. HDC has been influenced by land owning interests in selecting this site, and has not conducted a thorough search of alternatives. North of the town is considered to be a better location: it has less landscape impact; it does not impact on any rural community; it is better related to the strategic road network and services as it is adjacent to the Huntingdon Retail Park and A141; it is better related to labour supply; it could help fund a safe pedestrian/cycle bridge over the A141.</p>	<p>for employment development in the strategy because the town is the main economic centre for the district and is the first choice for employers to locate. If these factors were not recognised and the strategy tried to work against them it would be likely to increase out commuting and impact upon the economic competitiveness of the district. The selection of locations was based on a number of factors including assessments carried out for the Employment Land Review and the SHLAA. In these assessments the area west of the town scored more highly than the area to the north of the town.</p>	
Martin Leyland	Barratt Strategic	Policy Wording 7	227	O	<p>The allocation of 2ha of employment for Yaxley is not strategic in scale and should not be considered as part of the Core Strategy. This should come forward as an allocation in the Site Allocations DPD. The scale of growth proposed continues the piecemeal development of Yaxley which offers no wider benefits to the settlement.</p>	<p>The identification of locations for employment development will be clarified; however the overall scale of development for Yaxley is considered to be appropriate.</p>	<p>Submission plan amended including amendments to policy CS7 and reasoned justification.</p>
Ewen McLeod	Wrenbridge Land Ltd	Policy Wording 7	269	O	<p>Policy Wording 7 should be amended to provide a higher level of employment land in the District, better reflecting recent trends. It should be amended to recognise the locational advantages offered by the District</p>	<p>The Employment Land Review recommends the Low Carbon Future approach. The Core Strategy recognises that this approach will be challenging and makes appropriate allowances. It is</p>	<p>None.</p>

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr S Biart	Fairfield/Luminus	Policy Wording 7	303	C	<p>for new B8 uses, in particular the existing strategic road infrastructure and the committed improvements to the A14 Huntingdon/Cambridge section. In recognition of its locational advantages and site characteristics the former Alconbury Truckstop site should be identified as a suitable location for new B8 uses.</p> <p>The inclusion of the land to the south east/east of Godmanchester is supported. The reference to the development of the site being part of a mixed use development is not clear. The wording of this policy does not provide sufficient clarity. It is the representatives opinion that development on this land is to be residential led. The wording of both Housing and Employment policies does not clearly identify this as being the case, and should be amended.</p>	<p>considered that sufficient land is planned for. Delivery will be monitored and phasing will enable sufficient land supply.</p> <p>The reference to significant mixed use development is considered to be sufficiently clear. It is considered implicit that development in this location will be residential led. The only location where this is different is for Ramsey and this is clearly stated as being employment led.</p>	<p>Submission plan amended including amendments to policy CS7 and reasoned justification.</p>
Mr C Behagg	n/a	Policy Wording 7	446	O	<p>Object to the overall levels of employment land proposed for the District over the plan period as the 82 hectares identified may prove to be insufficient to meet the jobs required by the RSS. Oppose the very low level of provision in the Key Service Centres beyond the Spatial Planning Areas.</p>	<p>The link between jobs growth and employment land provision is indirect. The ELR identified a trend to higher job densities, particularly in the higher skill sectors that the Council is seeking to promote. It recommends the Low Carbon future as increasingly likely. It is acknowledged that it will be challenging. Given the strategic nature of the Core Strategy it is unreasonable to expect small scale opportunities in Key Service Centres to be identified. These small scale opportunities will continue to play an important part in maintaining and enhancing the sustainability of KSCs and smaller settlements.</p>	<p>None.</p>
H Raby & Sons	H Raby & Sons	Policy Wording 7	379	O	<p>Object to the overall levels of employment land proposed for the District over the plan period as the 82 hectares identified may prove to be insufficient to meet the jobs required by the RSS. Oppose the very low level of provision in the Key Service Centres beyond the Spatial Planning Areas.</p>	<p>The link between jobs growth and employment land provision is indirect. The ELR identified a trend to higher job densities, particularly in the higher skill sectors that the Council is seeking to promote. It recommends the Low Carbon future as increasingly likely. It is acknowledged that it will be challenging.</p>	<p>None.</p>



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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Connolly Homes Plc, David Wilson Es	Connolly Homes Plc	Policy Wording 7	445	S	We support the identification of a significant mixed use urban extension to include 25 ha of land for B1, B2 and B8 uses to the east of St Neots.	Given the strategic nature of the Core Strategy it is unreasonable to expect small scale opportunities in Key Service Centres to be identified. These small scale opportunities will continue to play an important part in maintaining and enhancing the sustainability of KSCs and smaller settlements.  Support noted. It should be noted that the 25ha identified is for the whole of the St Neots Spatial Planning Area and not just the urban extension.	None needed.
Bank Trustees	Bank Trustees	Policy Wording 7	470	O	Object to the overall levels of employment land proposed for the District over the plan period as the 82 hectares identified may prove to be insufficient to meet the jobs required by the RSS. Oppose the level of provision in the St Neots Spatial Planning Area.	The link between jobs growth and employment land provision is indirect. The ELR identified a trend to higher job densities, particularly in the higher skill sectors that the Council is seeking to promote. It recommends the Low Carbon future as increasingly likely. It is acknowledged that it will be challenging. Given the strategic nature of the Core Strategy it is unreasonable to expect small scale opportunities in Key Service Centres to be identified. These small scale opportunities will continue to play an important part in maintaining and enhancing the sustainability of KSCs and smaller settlements.	None.
Mr T Smith	n/a	Policy Wording 7	376	O	Object to the overall levels of employment land proposed for the District over the plan period as the 82 hectares identified may prove to be insufficient to meet the jobs required by the RSS. Oppose the very low level of provision in the Key Service Centres beyond the Spatial Planning Areas.	The link between jobs growth and employment land provision is indirect. The ELR identified a trend to higher job densities, particularly in the higher skill sectors that the Council is seeking to promote. It recommends the Low Carbon future as increasingly likely. It is acknowledged that it will be challenging. Given the strategic nature of the Core Strategy it is unreasonable to expect small scale opportunities in Key Service Centres to be identified. These small scale opportunities will continue to play	None.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Tim Fryer	n/a	Policy Wording 7	329	C	The first two sub-paragraphs of Policy Wording 2 are misleading as Brampton is covered twice. Development in the AAP area should be confined to Huntingdon.	It is considered that further clarification of locations for development in the HWAAP area would not be justified in the Core Strategy as this would pre-empt the AAP. Clarification of the locations will be made.	Submission plan amended including amendments to policy CS7 and reasoned justification.
Ely Diocese	Ely Diocese	Policy Wording 7	327	O	Growth east of St Neots is supported. It is necessary to master plan this growth to integrate employment land opportunities. The imbalance between Huntingdon and St Neots is inappropriate and the Plan would be unsound going forward in this way. From research carried out at the time of the last Local Plan Alteration in collaboration with Dr Moore of the Department of Land Economy, University of Cambridge, St Neots will play a significant role over the Plan period in meeting the employment needs of the Cambridge sub region. Work produced reveals a pattern of innovation based in Cambridge and then the more space extensive activities moving out to the localities nearby but without the constraints of Cambridge in terms of conservation and limited space.	The Employment Land review identifies Huntingdon as the main economic centre for the district and the first choice for employers to locate. As the strategy seeks to implement a significant scale urban extension in St Neots the amount of land identified for the town has been increased from that advocated in the Employment Land Review. Clarification of this will be included.	Submission plan amended including amendments to policy CS7 and reasoned justification.
Ely Diocese	Ely Diocese	Policy Wording 7	350	O	Growth east of St Neots is supported. It is necessary to integrate sufficient employment land opportunities. The figure for St Neots is inappropriate and the policy is unsound as a result. Support should be expressed in principle for redevelopment of poorly performing existing industrial and employment generating land uses for employment uses.	The Employment Land review identifies Huntingdon as the main economic centre for the district and the first choice for employers to locate. As the strategy seeks to implement a significant scale urban extension in St Neots the amount of land identified for the town has been increased from that advocated in the Employment Land Review. Clarification of this will be included..	Submission plan amended including amendments to policy CS7 and reasoned justification.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mrs Madelaine Liddiard	Godmanchester TC	Policy Wording 7	342	O	We broadly support the approach to employment but oppose the proposals for Godmanchester. We do not consider land should be designated for mixed use to the south east/east.	Support noted. It is implicit that development in this location will be residential led and in conjunction with the Council's Local Economy Strategy employment as part of the mix of uses will not be dominated by warehousing. .	None needed.
William Evans	WharfLand Investments	Policy Wording 7	381	O	Huntingdon is acknowledged as a key market town for growth by virtue of its status, retail provision, services and transportation infrastructure. We object to the dispersed growth pattern and the expansion at St Neots, St Ives and Ramsey and the level of development proposed at the key service centres of Godmanchester, Fenstanton and Sawtry. We propose a new Spatial Planning Area for Conington. It is proposed that strategic development here would accommodate a sustainable mix of residential and commercial uses in the form of a new community or a new settlement possibly in the form of a new eco-town. We propose development that relates to a "inked settlement" growth pattern between Peterborough, Conington and Huntingdon.	A new settlement would require substantial infrastructure and forward planning. There is a need for additional employment land in a shorter time frame than is likely to be possible from a new settlement. The Council considered a new settlement at Alconbury or Wyton (both having substantial brownfield areas) earlier in the process but discounted both. Clarification of the locations identified will be made.	Submission plan amended including amendments to policy CS7 and reasoned justification.
Property & Procurement	Cambs CC Property & Procurement	Policy Wording 7	417	O	Land on the northern edge of Brampton should be identified for employment as it is suitable for development including that for high quality employment and/or hotel.	The Core Strategy does not identify sites, only locations for development. Additionally it is considered that the Core Strategy should not identify locations that are only suitable for small or moderate scale development. With this in mind it is unreasonable to expect the Core Strategy to identify directions of growth where single or small numbers of sites, if allocated would lead to only moderate scale development.	None.
Stanton Group Developments Ltd	Stanton Group Developments Ltd	Policy Wording 7	454	S	We support mixed use development in Huntingdon and in the Huntingdon West Area Action Plan area.	Support noted.	None needed.
Martin Page	D.H. Barford	Policy Wording 7	618	O	The provision of 82ha for employment land over the plan period will be inadequate. To ensure the job growth target can be met and there is an adequate range of sites, as well	It is unrealistic to base future requirements on limited information about past performance without taking into account trends and policies that will affect	None.

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Chris Blackman	Cambs CC	Policy Wording 7	505	C	<p>as addressing the aim of reducing out commuting, the amount of employment land within the district needs to be significantly increased.</p> <p>The scale of employment growth is supported as being broadly in accord with the RES. There is considerable unease about these forecasts so this shouldn't be a major factor in judging the adequacy of the forecasts. Much of the growth will not be in B1, B2 or B8 type facilities.</p>	<p>future requirements. The Employment Land Review considers these trends and policies and recommends that the Low Carbon future should be followed. Given that there is such an indirect link between jobs and land provision and the variation in the amount of land considered to be required, delivery and supply will be monitored closely.</p> <p>Comments noted. The importance of Huntingdon in terms of its economic function for the district and the preference shown by employers for locating there supports the identification of the town as the focus for economic development during the plan period.</p>	None needed.
Cambridge Project Management	Cambridge Project Management	Policy Wording 7	546	O	<p>The policy wording in respect of employment development on the remaining phase 2 land at St Ives Business Park, Harrison Way, St Ives is ambiguous and clarification is required through changes to the text. Further employment land in St Ives should be brought forward and the phase 2 land should be acknowledged as available.</p>	<p>Where land is either allocated or has extant planning permission it is considered to be included by reference to existing commitments.</p>	None needed.
Strawsons Devt t/a Omnivale	Strawsons Devt t/a Omnivale	Policy Wording 7	559	O	<p>Wording is supported. It should be amended- At 7.34 add "Additional provision is made in the Ramsey Spatial Planning Area to aid regeneration, to reduce local unemployment and under-employment, to reduce out-commuting and to support the creation of a balanced community by complementing the planned growth in homes."  In Policy Wording 7 "in Ramsey Spatial Planning Area where at least '8ha of land, of which at least '6ha... for B1, B2 'and complimentary uses which also provide employment' to the west and north of Ramsey, 'notably on the former RAF Upwood'."</p>	<p>The future development of the Ramsey area has been limited due to Cambridgeshire and Peterborough Structure Plan policy 10/3 which seeks to limit economic development in Ramsey to small to medium scale development. Additionally Ramsey is isolated with poor transport links and a high level of car based out-commuting. With these factors in mind the 4ha identified for economic uses in Ramsey is considered to be appropriate. Clarification of locations identified will be made</p>	Submission plan amended including amendments to policy CS7 and reasoned justification.

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Persimmon Homes (East Midlands) Ltd	Persimmon Homes (East Midlands) Ltd	Policy Wording 7	577	O	The Plan fails test iv of the tests of soundness, as the strategy fails to consider the advice in Paragraph 24 of the PPS1: Planning and Climate Change supplement, PPG13: Transport and paragraph 5.69 of the EEP Panel Report.	It is acknowledged that the Preferred Options fail to consider advice in the PPS1 supplement due to it being published after the Preferred Options. The EEP Panel report does identify Huntingdon as a key centre for growth however this has not been taken on in the RSS, where Huntingdon is not identified as a Key Centre for Development and Change.	Submission plan amended including amendments to policy CS7 and reasoned justification.
John Blackburn	Little Paxton PC	Policy Wording 7	597	C	Land to the south of Lt Paxton has been designated for employment for several years but this is insufficient. An initiative to encourage employers to utilise this land is needed.	In order to maintain the strategic nature of the Core Strategy the employment policy identifies only those locations that are considered to be suitable for new large scale economic development. It is not considered appropriate to identify more local opportunities or existing commitments, however these will be supported, especially in Key Service Centres. Clarification of this approach will be made.	Submission plan amended including amendments to policy CS7 and reasoned justification.
Jockey Club Racecourses	Jockey Club Racecourses	Policy Wording 7	625	O	Clear support for existing rural businesses should be included in the Core Strategy. Policy Wording 7 should be amended to include support for business development in rural areas if it is on a scale which will help to provide local jobs, supports local businesses, and avoid adverse environmental impacts.	In order to maintain the strategic nature of the Core Strategy the employment policy identifies only those locations that are considered to be suitable for new large scale economic development. It is not considered appropriate to identify more local opportunities, however these will be supported, especially in sustainable locations such as Key Service Centres. Clarification of this approach will be made.	Submission plan amended including amendments to policy CS7 and reasoned justification.
Paul Seabrook	Seabrook Farms	Policy Wording 7	632	O	Object to the failure to fully consider growth in the smaller employment areas that provide employment opportunities throughout the district's rural hinterland and contributes to sustainability through local employment provision. The policy is inflexible, as it does not allow reasonable scope for the expansion of existing sites outside settlements. For these sites to remain feasible there must be scope to renew and redevelop existing premises and make new land available. Scope for the	In order to maintain the strategic nature of the Core Strategy the employment policy identifies only those locations that are considered to be suitable for large scale economic development. It is not considered appropriate to identify more local opportunities, however these will be supported, especially in sustainable locations such as Key Service Centres. Clarification of the policy about this approach will be made. Policies detailing the Council's approach to local	None.

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Property & Procurement	Cambs CC Property & Procurement	Policy Wording 7	521	O	expansion of employment sites with good transport links and sustainable working practices, where expansion can be incorporated on adjacent or closely related sites without detriment to the local environment should be included. The figures for Kimbolton raise concern, and how they impact upon its status in the Settlement Hierarchy. The supporting publication gives a skewed view on employment in Kimbolton. Kimbolton is an Historic Market Town, and there is a significant opportunity to improve sustainability through balanced provision of housing and employment.	The locations identified in the Employment Land policy are considered to be appropriate. Clarification of the locations identified will be made.	Submission plan amended including amendments to policy CS7 and reasoned justification.
Gates Hydraulics	Gates Hydraulics	Policy Wording 7	509	O	Policy wording 7 makes a prediction of the employment land required before 2026 but provides no guidance for those proposing employment generating development; or for those proposing alternative types of development on sites presently in employment use. The policy should have regard to draft PPS4.	The detail sought by the consultee is considered to be more appropriate for the Development Control DPD. Draft PPS4 was published after the Preferred Options and so could not be taken into account.	None needed.
Marlborough Developments Ltd	Marlborough Developments Ltd	Policy Wording 7	530	C	The allocation of 2ha of employment for Yaxley is not strategic in scale and should not be considered as part of the Core Strategy. This should come forward as an allocation in the Site Allocations DPD. The scale of growth proposed continues the piecemeal development of Yaxley which offers no wider benefits to the settlement.	The Core Strategy does not identify sites only locations of development. Clarification of identified locations will be made.	Submission plan amended including amendments to policy CS7 and reasoned justification.
Twigden Homes	Twigden Homes	Policy Wording 7	570	O	The provision of 10ha is a more appropriate level for Ramsey. Policy Wording 7 assumes that half of the employment land provision in Ramsey will be on Greenfield land. However, sufficient brownfield land is	The future development of the Ramsey area has been limited due to Cambridgeshire and Peterborough Structure Plan policy 10/3 which seeks to limit economic development in Ramsey	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
UK Land Investments	UK Land Investments	Policy Wording 7	586	O	There should be specific policy wording dealing with tourism which includes references to the provision of facilities in or adjacent to the four market towns and 'Key Service Centres'.	It is acknowledged that the policy does not make reference to tourism and its importance to the local economy. Tourism has been identified as an important employment sector for Huntingdonshire. Policies supporting tourism development will be included in the Development Control Policies DPD.	None.
UK Land Investments	UK Land Investments	Policy Wording 7	591	O	Should allow for employment related development in the Key Service Centres, to encourage locally based facilities, in addition to Huntingdon and St Neots. Buckden should be included within either the Huntingdon or St Neots Spatial Planning Areas as an appropriate location for employment development or as a modest residential/employment mixed use development.	In order to maintain the strategic nature of the Core Strategy the employment policy identifies only those locations that are considered to be suitable for large scale economic development. It is not considered appropriate to identify more local opportunities however these will be supported, especially in Key Service Centres. Clarification of the policy about this approach will be made.	None.
Huntingdon Water Tower Ltd	Huntingdon Water Tower Ltd	Policy Wording 7	613	S	The proposals to focus employment development in the market towns are supported. Proposals to secure high quality employment sites of strategic importance in sustainable locations are also supported. Support is given to proposals for the Huntingdon West Action Area and Western Gateway to the town and improvements to the A14. This should be a location for buildings of innovative design at this important entrance to the town centre and Hinchingsbrooke.	Support noted.	None.
Marshalls	Marshalls	Policy Wording 7	617	O	Concerned that development is to be limited to existing committed sites within the built up area of St Ives. This does not allow for the expansion needs of existing industry outside these areas.	Where sites have extant planning permissions or are currently allocated they are considered to be covered by the reference to existing commitments.	None.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Christine Beavon	Rectory Properties Ltd	Policy Wording 7	627	O	An additional area for employment land should be identified in Policy Wording 7 at Brampton Hut.	Expansion of existing employment uses will be covered in the Development Control Policies DPD.  The locations identified in the Employment Land policy are considered to be appropriate. Brampton Hut is not an appropriate location for a strategic Employment area as it is not well related to the main centres of population in the Spatial Planning Areas.	None needed.
Geoff Keeble	Highways Agency	Policy Wording 7	648	C	It is unclear which growth model would be put forward. For both models the required development would be mostly concentrated in the central employment market area around Huntingdon, although housing growth at St Neots will give rise to the need for significant additional new employment opportunities to create a sustainable community.	Comment noted. The locations identified in the Employment Land policy are considered to be appropriate.	None needed.
Mr John Scott	Stamford Homes	7.36	403	C	Supports policies which increase job opportunities within the town although these should not be restricted to B1, B2 and B8 uses as this could be achieved through enhanced services and facilities including those provided in retail and leisure. Restricting new residential development will not facilitate the development of new and existing employment allocations or provide the additional jobs in the service sector which Ramsey needs. If existing employment allocations are not suitable, they should be removed and other sites allocated, such as that at RAF Upwood, which may be more attractive to the market and meet the needs of employers	The employment policy identifies only the strategic locations suitable for large scale economic development in the standard 'B' uses. It is fully acknowledged that employment over the course of the plan period will come from many other sources. The Employment Land Review assesses the existing Local Plan allocations for employment uses and recommends retention of some. Unlike residential allocation employment allocation sometimes take a number of years to come to fruition. Economic development will be monitored and should it become evident that existing allocations will not come forward they will be de-allocated as part of future reviews.	None needed.



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**Table 19 Representation received on policy wording 8 Retail Development.**

Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Churchmanor Estates Company Plc	Churchmanor Estates Company Plc	7.38	252	O	The dispersal of retail development equally between Huntingdon & St Neots and again within St Neots between the town centre and the eastern expansion will not have the intended effect of retaining retail expenditure. No evidence to support a proven need for out of centre retail development in St Neots or that PPS6 tests have been applied. Instead retail development should be focussed on brownfield land in the town centres, and particularly in Huntingdon	CS8 focuses retail development in all available brownfield and town centre locations thereby demonstrating that PPS6 sequential tests have been applied. As the SHLAA and Scoping Report identifies brownfield opportunities, in sustainable locations are limited. This policy makes best use of brownfield land, particularly in Huntingdon with development proposed close to the town centre in a sustainable brownfield site. The Council considers the Retail Assessment Study (2005 & 2007) provide robust evidence to underpin this policy. It would not be appropriate to deliver the scale of housing development proposed in St Neots without providing associated retail services and facilities. Providing appropriate infrastructure with housing development is crucial in order to promote sustainable communities.	Submission plan revised to strengthen the reasoned justification for policy CS8 and provide further detail on the role of the different settlements in the retail hierarchy and to include stronger reference to the priority that the Chequers Court development takes.
Stanton Group Developments Ltd	Stanton Group Developments Ltd	7.38	447	S	We agree with the additional comparison and convenience floorspace proposed targets.	Support noted.	None needed.
Churchmanor Estates Company Plc	Churchmanor Estates Company Plc	7.39	251	C	The evidence provided in Vol 2 shows a weaker market demand in St Neots so it is surprising that the Preferred Option promotes St Neots area focused growth. Huntingdon has greater potential for qualitative improvements in shopping and thus more likely to increase the amount spent locally.	The Council considers the Retail Assessment Study to provide robust evidence to underpin the policy. The policy proposes a distribution of retail development that, on the one hand, recognises the role of Huntingdon as principal centre and seeks to build on its strengths to increase the proportion of retail expenditure locally but, on the other hand, acknowledges the need to boost the local economy of St Neots and provide retail services with the strategic urban extension.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Sainsbury's Supermarkets Ltd	Sainsbury's Supermarkets Ltd	7.39	424	C	The priority for convenience floorspace should be to ensure that the Chequers Court scheme comes forward and Sainsbury's can be relocated to facilitate that. The Council should address the capacity for a discount foodstore only after Sainsbury's relocation.	Comments noted. The Council is progressing the Huntingdon West Area Action Plan that will tackle the retail development in that area which should facilitate further projects in the town centre.	Submission plan revised to emphasise the priority that Chequers Court Phase II takes in paragraph 5.58. Other potential options arising from redevelopment in the Huntingdon West area are being dealt with separately in the AAP.
Stanton Group Developments Ltd	Stanton Group Developments Ltd	7.39	449	S	Agree with the statement suggesting that there may be further opportunities to increase convenience floorspace. This provides greater opportunities for retail expansion on sites close to the town centre, particularly within the Huntingdon West Area Action Plan area.	Support noted.	None needed.
Wm Morrison Supermarkets	Wm Morrison Supermarkets	7.39	540	S	Support the targets for retail floorspace.	Support noted.	None needed.
Geoff Keeble	Highways Agency	Policy Wording 8	53	S	The Preferred Approach for retail growth should be encouraged since maximising retail growth within the market towns could reduce the amount of car travel.	Support noted.	None needed.
Gareth Ridewood	CPRE	Policy Wording 8	85	C	Need to ensure any development does not threaten the viability of the existing towns' retail outlets. Oppose expansion of out of town retail. Need to encourage independent retailers that add character to our towns.	The Council recognises the important role that independent retailers have in promoting the local economy and helping to preserve settlement character. The need for additional retail development outside of town centres to complement existing retail outlets will be emphasised. Further information on maintaining the attractiveness of town centres by defining primary shopping areas and frontages will be set out in the Development Control Policies DPD.	Submission plan revised to strengthen the reasoned justification for policy CS8 and, in paragraph 5.59, include reference for the proposed district centre in St Neots to complement existing retail development.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Alison Melnychuk	St. Ives TC	Policy Wording 8	160	S	Support retail development in St Ives.	Support noted.	None needed.
Tom Gilbert-Wooldridge	English Heritage	Policy Wording 8	126	O	The supporting text does not explain how locations have been identified. The policy and supporting text lacks reference to potential environmental impacts. The historic environment is likely to be affected in every location. Reference to English Heritage guidance. Assessment of sites should be done before allocation.	The representation is not clear what it is about the policy that is opposed or what requires changing. The supporting text will be clarified to include more specific reference to evidence that supports the policy. It is not particularly clear which guidance produced by English Heritage the consultee is referring to. It is not appropriate for the Core Strategy to assess sites as it is a high level strategic document.	Submission plan revised to strengthen the supporting text and reasoned justification for policy CS8. Assessment of individual sites will be carried out in the Planning Proposals DPD.
Churchmanor Estates Company Plc	Churchmanor Estates Company Plc	Policy Wording 8	253	O	The majority of retail growth should be in Huntingdon where there is adequate capacity with St Neots and other local centres taking only some modest growth. There is no evidence of the sequential test being applied and no proven need for out of town retail development in St Neots.	The Retail Assessment Study provides a robust evidence base has taken PPS6 and the need for sequential tests into account. The distribution of growth is such that Huntingdon's position as principal retail centre can be strengthened, therefore increasing the proportion of local expenditure whilst boosting the retail economy in St Neots. It is essential to provide sufficient retail development to meet day to day needs within development of such a large scale.	None.
Somerfield Stores Ltd	Somerfield Stores Ltd	Policy Wording 8	231	C	It should be made clear that the convenience floorspace figure is for the whole district and should not necessarily be provided for in one development. It should reflect guidance in PPS6, particularly the sequential test.	It is considered that the policy is sufficiently clear regarding the location of the convenience floorspace, however the supporting text will be added to, with detail as suggested.	Submission plan revised to strengthen supporting text and reasoned justification for policy CS8.
Connolly Homes Plc, David Wilson Es	Connolly Homes Plc, David Wilson Es	Policy Wording 8	448	S	Supports some of the 9000m2 comparison floorspace being accommodated in a new district centre as part of the mixed use extension to the east of St Neots.	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Sainsburys Supermarkets Ltd	Sainsburys Supermarkets Ltd	Policy Wording 8	423	C	Support the concentration of retail growth within Huntingdon and St Neots. However we object to the lack of clear guidance on the strategy for addressing retail requirements and The need to relocate the existing Sainsbury's to facilitate the Chequers Court scheme in Policies 2 and 8.	To maintain the strategic nature of the Core Strategy it is not considered appropriate to include detail as suggested in this representation. Supporting text can be added to in order to emphasise the importance of development and redevelopment for the town centres of the district particularly Huntingdon.	Submission plan revised to strengthen supporting text and reasoned justification.
Mr John Scott	Stamford Homes	Policy Wording 8	404	O	Objects that no provision is made for additional retail floorspace in Ramsey to maintain its important role as a market town and secure its regeneration.	The Retail Study concluded that Ramsey is unlikely to require significant comparison floorspace and that the district wide requirements for convenience floorspace is limited and dispersed across the whole district. Retail development is not ruled out for Ramsey but it is considered to be unsuitable for identification of significant retail development in addition to that already permitted.	Submission plan revised to acknowledge the role that retail plays in regeneration in paragraphs 3.31 and 3.32 as well as information on existing retail commitments in Ramsey provided in paragraph 5.61.
Mrs Madelaine Liddiard	Godmanchester TC	Policy Wording 8	343	S	Support the revitalisation of Huntingdon town centre which will need improved access and parking.	Support noted.	None needed.
Resolution Asset Management	Resolution Asset Management	Policy Wording 8	358	S	The policy is considered to be consistent with both national and local planning policy. The quantum of floorspace identified is supported.	Support noted.	None needed.
Cambridgeshire County Council	Cambs CC	Policy Wording 8	361	S	Supports the Retail policy particularly the floorspace identified for each centre. It is the most appropriate option having regard to the established retail hierarchy of the District	Support noted.	None needed.
Stanton Group Developments Ltd	Stanton Group Developments Ltd	Policy Wording 8	455	O	Disagree with the equal distribution of comparison floorspace between Huntingdon and St Neots as Huntingdon is identified in 7.39 as 'the higher order centre where pressure for further development is the greatest'. The most appropriate strategy would be to accommodate an increased level of floorspace in Huntingdon.	The distribution of growth is such that Huntingdon's position as principal retail centre can be strengthened, therefore increasing the proportion of local expenditure whilst boosting the retail economy in St Neots. It is essential to provide sufficient retail development to meet day to day needs within development of such a large scale.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
DH Barford (Agent) - Martin Page	DH Barford	Policy Wording 8	619	S	The policy is too restrictive in terms of potential locations for further retail development. The Retail Study identifies the need for a discount food store in Huntingdon and the policy identifies convenience floor space being provided within the town centres. The only scope for significant further retail development is in Huntingdon - options for town centre development in the other towns are limited. The policy refers to potential development in the Huntingdon West area and also within the mixed use urban extension to the east of St Neots; however these will not be in the town centre. To reflect this the policy text should refer to future retail development being "in or in close to town centres, or locations where the development will serve existing or proposed urban extensions"	It is considered appropriate that the preference for the location of retail development is in the town centres. It is however acknowledged that this may not always be possible. The Retail Assessment Study has taken account of national guidance in PPS6 and sequential tests and this has therefore informed the development of this policy. It would not be appropriate to repeat government guidance in the Core Strategy.	None.
Persimmon Homes (East Midlands) Ltd	Persimmon Homes (East Midlands) Ltd	Policy Wording 8	582	O	The policy should conform with the EEP Panel Report that identified Huntingdon as a key centre for growth followed by St Neots and then St Ives..	The EEP Panel Report listed Huntingdon as one of a number of possible locations for future growth, but this does not form part of the East of England Plan.	None needed.

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Table 20 Representations received on the Key Diagram and policy wording 9.

Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Chris Blackman	Cambs CC	7.42	482	C	An "Accession" assessment of the locational and accessibility aspects of the Key Diagram, shows principally: The Huntingdon Spatial Planning Area scored highest overall largely because the town of Huntingdon has 15 of the 16 key services located within its environs. The St Ives Spatial Planning Area scored well largely because the majority of the key services are located within the town of St Ives. The St Neots Spatial Planning Area has very similar characteristics to the St Ives Spatial Planning Area. The majority of the key services are located within the town of St Neots. Sites within the Ramsey Spatial Planning Area scored lower than the other market town spatial planning areas because it has less key services located within its environs. Like Ramsey, the Key Service Centres of Fenstanton, Sawtry and Yaxley scored lower than the larger market towns because they have a lower number of key services located within or close to their environs.	Comments noted. The data provided will be included in the submission version.	Submission plan revised to include data provided by the consultee in appendix 1 of Volume 2.
Sywell Land Ltd	Sywell Land Ltd	7.42	610	O	Land to the west of Yaxley merits designation as a Direction of Growth for residential development. Yaxley is an appropriate sustainable location for further development and the westerly direction is the most appropriate.	The sustainable nature of Yaxley is recognised with its designation as a Key Service Centre and as a location suitable for large scale development. This is considered to be the most appropriate level of development for Yaxley as unlike Godmanchester it does not have the same range of facilities within such close proximity. It is acknowledged that Peterborough offers a greater range of services than Huntingdon, however despite reasonable public transport services, because Yaxley is further away many more trips are going to be made by car, which is clearly not sustainable.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr David Stowell	Spaldwick and Stow Longa PCs	Figure 7.1	1	C	"Market towns are Key Service Centres" should read "Market towns and Key Service Centres". Add "retail" in St Ives Spatial Planning Area description.	Typo will be corrected.	Key Diagram key amended.
Mr Michael Palmer-Asplin	n/a	Figure 7.1	31	O	Add employment arrow east of St Ives, outside of the floodplain.	It is considered that no change to the key diagram is necessary as this is not a new development location.	None.
Maydo Pitt	GO-East	Figure 7.1	37	O	Include an indication of growth within the built up area	The key diagram includes development details and identifies location for development within the built up area.	None.
Mr David Reavell	O&H Properties	Figure 7.1	196	O	The urban area of Peterborough should be redrawn correctly to include Hampton which extends to the district boundary. The red arrow east of Yaxley should be removed as this is not a strategic allocation and a separate notation should be made for Yaxley reflecting the need to work with PCC to ensure the long term sustainable planning for growth in this location.	The diagram by its very nature should not be expected to be an accurate representation of the district or its surroundings. The representation of Peterborough on the key diagram is considered to sufficiently represent the built up area of the city. The red employment arrow will be removed following clarification of the employment development policy. It is not considered necessary to identify Yaxley in any special way as suggested. The Spatial Planning Areas are not denoted on the map and it is considered that the suggestion is a similar designation. The designation of a spatial area for Yaxley or some similar designation has been dealt with in the response to other representations.	Key diagram amended.
FLP	FLP	Figure 7.1	278	S	Support in respect of Sawtry	Support noted.	None needed.
Stamford Homes (Midlands) Ltd	Stamford Homes (Midlands) Ltd	Figure 7.1	259	O	Object to the preferred direction for development in St Ives as being to the west. The considerable unconstrained opportunities to the north should be identified.	The locations of growth for St Ives are considered to be appropriate. Please refer to responses to representations on Policy 2 for more detail.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Martin Leyland	Barratt Strategic	Figure 7.1	220	O	The urban area of Peterborough should be redrawn correctly to include Hampton which extends to the district boundary. The red arrow east of Yaxley should be removed as this is not a strategic allocation and a separate notation should be made for Yaxley reflecting the need to work with PCC to ensure the long term sustainable planning for growth in this location.	The diagram by its very nature should not be expected to be an accurate representation of the district or its surroundings. The representation of Peterborough on the key diagram is considered to sufficiently represent the built up area of the city. The red employment arrow will be removed following clarification of the employment development policy. It is not considered necessary to identify Yaxley in any special way as suggested. The Spatial Planning Areas are not denoted on the map and it is considered that the suggestion is a similar designation. The designation of a spatial area for Yaxley or some similar designation has been dealt with in the response to other representations.	Key diagram amended.
Mr C Behagg	n/a	Figure 7.1	450	O	Diagram should indicate employment development for Fenstanton as the location east of London Road can offer up to 12 ha	In line with the strategic nature of the Core Strategy the key diagram only identifies those locations of growth identified in policies in the Core Strategy as being suitable for large scale growth. The key diagram identifies Fenstanton as a Key Service Centre and the locations within the village and to the east and south, however as no further locations have been identified as suitable for large scale growth in the policies there are no further designations applied on the Key Diagram. For further detail please refer to the responses to representations on policy 7.	None needed.



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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Lord De Ramsey	Abbots Ripton Estates	Figure 7.1	432	O	Object. Ramsey spatial planning area should receive more growth, particularly to the north east of the town.	In line with the strategic nature of the Core Strategy the key diagram only identifies those locations of growth as being suitable for large scale growth. For detail as to why locations to the north east of Ramsey are not identified please refer to responses to representations on policy 2.	None needed.
H Raby & Sons	H Raby & Sons	Figure 7.1	384	O	Object. Diagram should indicate employment growth of up to 31.5 ha at Brookfield Farm, Great Stukeley.	It is not considered necessary to identify the land suggested as a location for employment development. Please see the response to representations on policy 7 for more details.	None needed.
Lenton Trustees (L019)	Lenton Trustees	Figure 7.1	410	O	Object as diagram indicates that Huntingdon spatial planning area could receive less growth than St Neots spatial planning area which is not as sustainable. Land west of Brampton should be identified.	In line with the strategic nature of the Core Strategy the key diagram only identifies those locations of growth as being suitable for large scale growth. For detail as to why locations are not identified please refer to responses to representations on policy 2.	None needed.
Bank Trustees	Bank Trustees	Figure 7.1	472	O	Diagram should indicate growth east/south-east rather than east of St Neots, which is more appropriate than that identified for St Neots. Land at Potton Road is appropriate for sustainable, mixed development.	It is not the intention to rule out sites that fit the description given in the policy, however it has proved difficult to clearly identify this location on the diagram.	None needed.
Mr C Dodson	n/a	Figure 7.1	414	O	Object as Somersham is not identified to accommodate growth.	In line with the strategic nature of the Core Strategy the key diagram only identifies those locations of growth as being suitable for large scale growth. The key diagram identifies Somersham as a Key Service Centre but as it has not been identified as suitable for large scale growth in the policies there are no further designations applied on the Key Diagram.	None needed.
Mrs Warnes	n/a	Figure 7.1	427	O	Object as diagram does not identify Yaxley to accommodate peripheral growth - sites south of The Drive and	In line with the strategic nature of the Core Strategy the key diagram only identifies those locations of growth identified in policies in the Core Strategy	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Property & Procurement	Cams CC Property & Procurement	Figure 7.1	416	O	west of The Wykes represent available and suitable land which can facilitate a sustainable extension.  Object. Diagram should indicate potential for limited peripheral employment development at Brampton, particularly to the north of the village	as being suitable for large scale growth. The key diagram identifies Yaxley as a Key Service Centre and the development locations within the village and to the east but as no further locations have been identified in the policies there are no further designations applied on the Key Diagram. For further detail please see responses to representations on policy 2.	None needed.
Mr J Stokes	n/a	Figure 7.1	460	O	Object. Diagram should indicate housing growth at Warboys, particularly south of Farrers Way.	In line with the strategic nature of the Core Strategy the key diagram only identifies those locations of growth as being suitable for large scale growth. The key diagram identifies Brampton as a Key Service Centre and the large scale mixed use development location in the village but as other locations have not been identified as suitable for large scale growth in the policies there are no further designations applied on the Key Diagram.	None needed.
Wagstaffe & Abblitt	Wagstaffe & Abblitt	Figure 7.1	584	O	Support the principle of development to the north of Ramsey but would like the key diagram to include an area of mixed development (of about 15ha) along Stocking Fen as this is more sustainable than development along St Mary's Road.	In line with the strategic housing growth policy the key diagram identifies the locations that the Council considers to be suitable for large scale housing development. For further detail please refer to responses to representations on policy 2.  The general location to the north/north west of Ramsey has been identified for mixed use development. This is considered to be appropriate for Ramsey	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mrs J Daniels	n/a	Figure 7.1	512	O	Object. Diagram should indicate growth at Warboys, particularly a location west of Ramsey Road on a partly brownfield site.	In line with the strategic housing growth policy the key diagram identifies the locations that the Council considers to be suitable for large scale housing development. For further detail please refer to responses to representations on policy 2.	None needed.
Persimmon Homes	Persimmon Homes	Figure 7.1	541	O	Other options should be explored as directions of growth for St Ives. Key diagram should include an option for development on the eastern side of Hemingford Grey - a comparatively sustainable location, given its facilities, proximity to a substantial range of facilities in St Ives and bus services	In line with the strategic housing growth policy the key diagram identifies the locations that the Council considers to be suitable for large scale housing development. For further detail please refer to responses to representations on policy 2. Please also refer to the Settlement Hierarchy Background Paper.	None needed.
Adam Ireland	Environment Agency	Figure 7.1	537	S	We can confirm that the directions for proposed strategic development as delineated on the key diagram conform to the sequential test in PPS25 and are therefore sound as informed by suitable evidence base.	Support noted.	None needed.
Mr Burgess	n/a	Figure 7.1	518	O	Object. Diagram should indicate peripheral growth at Yaxley – land south of The Drove and west of The Wykes is available and suitable for a sustainable extension to Yaxley.	In line with the strategic housing growth policy the key diagram identifies the locations that the Council considers to be suitable for large scale housing development. For further detail please refer to responses to representations on policy 2.	None needed.
Edwards	n/a	Figure 7.1	500	O	Object, more growth should be shown for Ramsey Spatial Planning Area given its status as market town. Diagram does not allow for non strategic greenfield development east of Bury Road, Ramsey.	For more information concerning the scale of development identified for Ramsey please see the responses to representations to policy 2. In line with the strategic nature of the Core Strategy the key diagram identifies those locations that have been identified through the policies as suitable for large scale development. The Core Strategy will not identify smaller scale development opportunities. Where such opportunities	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Property & Procurement	Cams CC Property & Procurement	Figure 7.1	523	O	Object. Employment development south east of Yaxley should be shown.	In line with the employment policy the key diagram identifies the locations that the Council considers to be suitable for large scale employment development. For further detail please refer to responses to representations on policy 7.	None needed.
Marlborough Developments Ltd	Marlborough Developments Ltd	Figure 7.1	531	C	The urban area of Peterborough should be redrawn correctly to include Hampton which extends to the district boundary. The red arrow east of Yaxley should be removed as this is not a strategic allocation and a separate notation should be made for Yaxley reflecting the need to work with PCC to ensure the long term sustainable planning for growth in this location.	The diagram by its very nature should not be expected to be an accurate representation of the district or its surroundings. The representation of Peterborough on the key diagram is considered to sufficiently represent the built up area of the city. The red employment arrow will be removed following clarification of the employment development policy. It is not considered necessary to identify Yaxley in any special way as suggested. The Spatial Planning Areas are not denoted on the map and it is considered that the suggestion is a similar designation. The designation of a spatial area for Yaxley or some similar designation has been dealt with in the response to other representations.	The employment arrow at Yaxley has been removed.
Burgess Burgess and Cooper	n/a	Figure 7.1	560	S	Support for location south of Fenstanton	Support noted.	None needed.
Twigden Homes	Twigden Homes	Figure 7.1	564	O	Does not reflect policy wording 2 and is too specific. Growth west of Ramsey should be indicated as this is more sustainable and accessible than that to the south (RAF Upwood).	The identification of development locations for the west of Ramsey is considered to be appropriate.	None needed.
Mr R Bruce	n/a	Figure 7.1	581	S	Support but growth at Buckden should be included in diagram The scale appropriate at Buckden should be in the range of 10-59 dwellings.	Support noted. Buckden is identified on the key diagram as a key service centre.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
UK Land Investments	UK Land Investments	Figure 7.1	587	O	Include arrow for tourist and or residential/mixed development adjacent to the west of Buckden.	In line with the policies the key diagram identifies the locations that the Council considers to be suitable for large scale development. For further detail please refer to responses to representations on policy 2 and 7.	None needed.
Mr T Smith	n/a	Figure 7.1	652	O	Object. More growth should be indicated within St Ives Spatial Planning area given its location in Cambridge sub region. Arrow should point to the north/north west of St Ives, not just the west.	In line with the strategic housing growth policy the key diagram identifies the locations that the Council considers to be suitable for large scale housing development. For further detail please refer to responses to representations on policy 2.	None needed.
Mr Philip Raiswell	Sport England		162	C	Include reference to Open Space, Sport and Recreation Needs Assessment and Audit (2006) within Strategic Greenspace Enhancement policy.	Reference to the supporting evidence will be made.	Submission plan amended including identification of the evidence base in appendix 2.
Thornhill Estates	Thornhill Estates		461	S	Support. Promotes Little Paxton Quarry as suitable for appropriate leisure/tourism based activities.	Support noted.	None needed.
Gareth Ridewood	CPRE	8.1	86	S	Include reference to biodiversity.	Reference to biodiversity will be incorporated.	Submission plan amended including amended policy CS9 and reasoned justification.
Geoff Keeble	Highways Agency	Policy Wording 9	64	S	Support as Greenspace enhancement areas can encourage sustainable travel such as walking and cycling.	Support noted.	None needed.
Gareth Ridewood	CPRE	Policy Wording 9	87	S	Emphasise importance of local green spaces integrated within all development.	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Alison Melnyczuk	St. Ives TC	Policy Wording 9	166	C	Important to ensure separateness and distinctiveness of settlements through areas of strategic greenspace. Particularly important for west of St Ives.	The maintenance of separation between settlements is considered to be of particular importance and strategic green infrastructure and open space can help protect separation.	None needed.
Tom Gilbert-Wooldridge	English Heritage	Policy Wording 9	127	O	No reference made to historic environment. Add: "conserve and enhance relevant historic and cultural assets." Reference historic environment in supporting text.	The importance of the historic environment to green infrastructure is acknowledged. The suggested text is considered to be too vague, however consideration to appropriate wording will be given.	Submission plan amended including amended policy CS9 and reasoned justification.
Mr Michel Kerrou	River Nene Regional Park	Policy Wording 9	93	C	Green Infrastructure map and/or policy fail to acknowledge adjoining initiatives such as the Nene Valley Strategy. Reference should be made to optimise opportunity for linkages to be made.	Links with the wider green infrastructure network outside the district are important. Reference to the importance of these links will be included.	Submission plan amended including amended policy CS9 and reasoned justification.
Mr Justin Tilley	Natural England	Policy Wording 9	317	S	Support.	Support noted.	None needed.
Mr Justin Tilley	Natural England	Policy Wording 9	319	S	Supports strategic initiative for greenspace enhancement, but add reference in supporting text on the treatment of landscape and wildlife conservation and countryside access to areas not covered by this policy.	Consideration will be given to how best to incorporate the importance of landscape and wildlife conservation throughout the district while maintaining the strategic nature of this policy.	Submission plan amended including amended policy CS9 and reasoned justification.
Miss Rachel Pateman	Wildlife Trust	Policy Wording 9	274	S	Support but include objective to "safeguard sites of existing nature conservation value" and an additional enhancement area woodland south of Hunts (part of Forest of S. Cambs project).	The policy will be amended to include reference to existing sites of nature conservation value. Consideration will be given to inclusion on the diagram of additional areas for strategic greenspace enhancement.	Submission plan amended including amended policy CS9 and reasoned justification.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Ms Diane Millis	Woodland Trust	Policy Wording 9	234	C	Insufficient consideration given to adaptation to climate change – developing resilient natural systems able to respond to and absorb change. Incorporate Woodland Access Standard as a monitoring indicator.	Reference to the importance of adaptation to climate change will be incorporated.	Submission plan amended including amended policies CS1 & CS9 and the supporting text.
Bedfordia Developments	Bedfordia Developments	Policy Wording 9	302	S	We support in principle the Area of Strategic Greenspace Enhancement along with green corridors connecting them and consider the residential development of Bedfordia Fields linked to the provision of a large parkland area will provide visual and biodiversity enhancement, together with increased public access.	Support noted.	None needed.
Daniel Heenan	n/a	Policy Wording 9	359	O	Regardless of investment priorities all strategically important green infrastructure should be identified in the Development Plan included the River Nene Regional Park Initiative.	Consideration will be given to how best to include strategically important green infrastructure that is outside district boundary. While the importance of the River Nene Regional Park is acknowledged the importance to the district of the Great Fen Project for example is more significant..	Submission plan amended including amended policy CS9 and reasoned justification.
Mr Tim Fryer	n/a	Policy Wording 9	330	C	Include more on protection and maintenance of existing greenspace include in 1 <sup>st</sup> criteria: "safeguard existing and potential." Include reference to Country Park in para 5.42	Policy and supporting text will be amended to identify the importance of existing sites of nature conservation value.	Submission plan amended including amended policy CS9 and reasoned justification.
Mrs Madelaine Liddiard	Godmanchester TC	Policy Wording 9	344	S	Support but would like to see greater facilities provided across the District to allow easier access to the countryside, new footpaths and walks.	In line with the strategic nature of the Core Strategy it is considered appropriate to concentrate on those green corridors of particular importance for the district. The importance of improving access to the countryside at a more local level is acknowledged and consideration will be given to including suitable references.	Submission plan amended including amended policy CS9 and reasoned justification.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Chris Blackman	Cambs CC	Policy Wording 9	508	C	Support inclusion of Strategic Greenspace and reference to Green Infrastructure Strategy. Areas of enhancement should reference to this Strategy and the areas identified in Structure Plan and Biodiversity Partnership 50 Year Wildlife Vision. Potential connections between Camboorne and Cambridge need to be considered as well as the continuing importance of existing Ouse Valley Corridor. Delete "reinstate" suggest add "create" green infrastructure and a network of corridors connecting the key areas across Cambridgeshire.	Reference to the documents will be included. Consideration will be given to how best to include strategically important green infrastructure that is outside district boundary.	Submission plan amended including amended policy CS9 and reasoned justification.
Anglian Water Property Ltd	Anglian Water Property Ltd	Policy Wording 9	552	S	Support the Council's proposal to identify Grafham Water as an area of Strategic Greenspace Enhancement. Whilst supporting the need to enhance the environmental assets of the District, wish to support the continued growth of Grafham Water as a centre for tourism and recreation. Amend 3 <sup>rd</sup> bullet to: "contribute to diversification of the local economy and tourist development through provision of new facilities".	Support noted. Suggested wording is considered suitable and will be included.	Submission plan amended including amended policy CS9 and reasoned justification.
Ian Burns	Cambs PCT	8.3	185	C	Support but include reference to health benefits in reasoned justification for enhancement of green space.	Comments noted. The inclusion of an appropriate reference will be included.	Submission plan amended including amended policy CS9 and reasoned justification.
Gareth Ridewood	CPRE	8.4	88	S	Support	Support noted.	None needed.
Chris Blackman	Cambs CC	8.4	479	O	Para 8.4 change to: "The Cambridgeshire Horizons Green Infrastructure Strategy (Cambridgeshire Green Vision)..."	Suggested change is accepted and will be incorporated.	Submission plan amended including amended policy



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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Gareth Ridewood	CPRE	8.6	232	S	Support, particularly Great Fen Project.	Support noted.	None needed.
Chief Engineer	Middle Level Commissioners	8.6	375	C	Care should be taken to ensure that the non-IDB maintained local land drainage/flood defence systems are not detrimentally affected. Consideration for long term maintenance needs to be had.	Comments noted.	None needed.
Mr Tim Fryer	n/a	8.7	332	C	Include Hinchingsbrooke Country Park in the Strategic Green Infrastructure.	Reference to Hinchingsbrooke Country Park will be included.	Submission plan amended including amended policy CS9 and reasoned justification.
Anglian Water Property Ltd	Anglian Water Property Ltd	8.7	555	S	Para 8.7 include: Grafham Water offers opportunities for water and <i>land based recreation</i> .... A major focus of initiatives in this area will be the provision of improved <i>links to green space for people and wildlife through green corridors incorporating sustainable access routes</i> "	Support noted. Consideration of suggested changes will be given.	Submission plan amended including amended policy CS9 and reasoned justification.
Gareth Ridewood	CPRE	8.8	89	S	support	Support noted.	None needed.
Mr David Stowell	Spaldwick and Stow Longa PCs	Figure 8.1	3	C	Change to colour of market towns and key service centres to clarify map.	While it is considered that the diagram is sufficiently clear changing the colour of the towns and key service centres is likely to aid clarity so will be incorporated.	Submission plan amended including amended diagram for policy CS9.
Russell Saywell	n/a	Figure 8.1	47	S	Support – as land previously proposed for residential development north of Little Paxton now excluded.	Support noted.	None needed.
Chris Blackman	Cambs CC	Figure 8.1	483	O	Add the pre-existing green corridor of the Ouse Valley and the cross-border green corridor towards Cambourne and Cambridge.	The Ouse Valley is clearly shown on the diagram. Consideration will be given to the inclusion of further green corridors and areas of strategic greenspace.	Submission plan amended including amended diagram for policy CS9.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Tim Fryer	n/a	Figure 8.1	333	S	Strongly supported particularly the 'Brampton towards Grafham cycleway / bridleway'.	Support noted.	None needed.
Anglian Water Property Ltd	Anglian Water Property Ltd	Figure 8.1	554	S	Supports the inclusion of Grafham Water as Strategic Green Infrastructure.	Support noted.	None needed.
UK Land Investments	UK Land Investments	Figure 8.1	589	O	Include specific reference to tourism related development.	The consultee is not clear how tourism related development should be identified on the diagram. Consideration will be given to additional supporting text highlighting the importance of tourism in relation to green infrastructure.	Submission plan amended including amended policy CS9 and reasoned justification.

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Table 21 Representations on policy wording 10 infrastructure requirements.

Full Name	Organisation	Rep On	Rep Id	Type	Summary	Officers' Response	Action Taken
Chief Engineer	Middle Level Commissioners	8.9	369	C	There is a need to appreciate that any contribution required by the Council for Drainage/Flood prevention will be in addition to those received by the Middle Level Commissioners under the Land Drainage Act 1991 and associated byelaws.	Comments noted.	None needed.
Gary Parsons	Anglian Water	Policy Wording 10	10	C	Water and sewerage services are outside the scope for S106 or planning gain. As a private company, Anglian Water Services is obliged to provide adequate services under its licence. Funding is sought through charges to its customers. The provision of infrastructure will be constrained by environmental, planning and financial considerations. A Water Cycle Strategy would provide a framework for planning and infrastructure provision.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements. A Water Cycle Study is being undertaken.	Submission plan amended including amendments to the Infrastructure and Implementation and Monitoring Sections.
Maydo Pitt	GO-East	Policy Wording 10	42	O	We consider that the submission policy should provide more certainty for developers about what, how and when infrastructure requirements and financial contributions will be sought, including prioritisation of infrastructure items listed, indication of any specific strategic infrastructure items requiring developer contributions, and trigger points for when contributions would be expected. We broadly support, the proposed SPDs, however the policy is not clear or certain enough to enable SPDs to cover the important matters of infrastructure and developer contributions. The SPDs should cover the detailed elements, building upon a clear strategic policy. Test 7	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify the areas identified in this representation.	Submission plan amended including amendments to the Infrastructure and Implementation and Monitoring Sections.
Geoff Keeble	Highways Agency	Policy Wording 10	65	O	No reference is made to improvements in sustainable transport infrastructure to support proposed development. It is	Following consideration of comments substantial rewriting of the Infrastructure section is	Submission plan amended including amendments to the

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Full Name	Organisation	Rep On	Rep Id	Type	Summary	Officers' Response	Action Taken
					recommended that a hierarchy is established whereby sustainable travel measures are put forward ahead of contributions to highways or car parks.	considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority.	Infrastructure and Implementation and Monitoring Sections.
Mr Philip Raiswell	Sport England	Policy Wording 10	168	S	Welcome the specific identification of open space and recreation as the target of planning contributions.	Support noted.	None needed.
Alison Melnyczuk	St. Ives TC	Policy Wording 10	170	C	Infrastructure contributions should be viewed in terms of the impact the development will have on communities nearby as well as where the development is. Surface water flooding in St Ives will be exacerbated with new development unless extensive attenuation schemes are incorporated. These schemes should be incorporated on all developments within its hinterland to ensure there is no transfer of problem.	Comments noted. While the importance of flood attenuation is acknowledged, particularly for St Ives, it is not considered to be an issue that requires additional prescription in the Core Strategy.	None needed.
Tom Gilbert-Wooldrige	English Heritage	Policy Wording 10	128	C	Reference should be made to improvements to the historic environment, to maximise opportunities for enhancements.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements.	Submission plan amended including to the Infrastructure and Implementation and Monitoring Sections.
Mr S Ross	Swan Hill Homes	Policy Wording 10	113	O	Reference to contributions for maintenance conflicts with advice at paragraph B19 of Circular 05/2005.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements.	Submission plan amended including to the Infrastructure and Implementation and Monitoring Sections.
Mr Justin Tilley	Natural England	Policy Wording 10	323	S	We support open space and recreation, strategic green infrastructure, footpaths, bridleways, cycleways and environmental improvements in the list for development contributions.	Support noted.	None needed.
Miss Rachel Pateman	Wildlife Trust	Policy Wording 10	276	S	We support the inclusion of strategic green infrastructure here.	Support noted.	None needed.

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Full Name	Organisation	Rep On	Rep Id	Type	Summary	Officers' Response	Action Taken
National Grid Property Ltd	National Grid Property Ltd	Policy Wording 10	282	O	The policy should state that when determining the level of contributions sought, site specific considerations will be taken into account.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority.	Submission plan amended including Infrastructure and Implementation and Monitoring Sections.
Ian Burns	Cambs PCT	Policy Wording 10	187	S	We support contributions towards health and social care infrastructure and, where appropriate for management and maintenance of services and facilities.	Support noted.	None needed.
Ian Burns	Cambs PCT	Policy Wording 10	188	C	Community development provision to facilitate the development of social infrastructure should be included. This follows the recommendations in Cambridgeshire PCT's report on the effect of the Social Environment on Mental health (S.Goh 2007).	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements. To include requirements for contributions evidence of what is required and why will be required.	Submission plan amended including Infrastructure and Implementation and Monitoring Sections.
Mr Steven Harvey	n/a	Policy Wording 10	211	O	We object and suggest that requirements are tempered, so there is confidence that a fair contribution that is directly related to local community needs is negotiated and that the viability of the proposed scheme, including the developer's profit, will be taken into account.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements.	Submission plan amended including Infrastructure and Implementation and Monitoring Sections.
Chris Blackman	Cambs CC	Policy Wording 10	485	O	Where definite, site-specific, infrastructure requirements arise from development proposals, they should be included in the Submitted version of the Core Strategy	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority including specific infrastructure requirements where known.	Submission plan amended including Infrastructure and Implementation and Monitoring Sections.
Chris Blackman	Cambs CC	Policy Wording 10	487	C	We welcome travel planning in the list. This should include residential travel plans. Environmental improvements for	Comments noted. Where appropriate specific requirements will be detailed	Submission plan amended including Infrastructure and Implementation and Monitoring Sections.

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Full Name	Organisation	Rep On	Rep Id	Type	Summary	Officers' Response	Action Taken
					biodiversity should include provision of mitigation/compensatory habitat, enhancement of existing habitats including management, the linking of fragmented habitats and buffering of habitat and creating new habitat, including wildlife corridors to connect development with surrounding landscape.	along with more detail as to the scope of contributions that may be required.	Infrastructure and Implementation and Monitoring Sections.
Mr Peter Glazebrook	HallamLand Management	Policy Wording 10	394	C	We accept contributions to infrastructure and community benefits which are necessary in conjunction with development. However, any negotiations must take account of site specifics including viability which could be affected by affordable housing requirements.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority.	Submission plan amended including amendments to the Infrastructure and Implementation and Monitoring Sections.
Sainsburys Supermarkets Ltd	Sainsburys Supermarkets Ltd	Policy Wording 10	425	C	The policy should include reference to the policy guidance set out under Circular 05/05.	Reference to the circular will be included.	Submission plan amended including amendments to the Infrastructure and Implementation and Policy CS10.
Rose Freeman	The Theatres Trust	Policy Wording 10	366	S	The policy is supported and we are pleased that a SPD will be prepared setting out the details of planning obligations.	Support noted.	None needed.
Mr John Scott	Stamford Homes	Policy Wording 10	398	C	We accept contributions to, infrastructure and community benefits which are necessary in conjunction with development. However, any negotiations must take account of site specifics including viability which could be affected by affordable housing requirements.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority.	Submission plan amended including amendments to the Infrastructure and Implementation and Monitoring Sections.
Mrs Madelaine Liddiard	Godmanchester TC	Policy Wording 10	345	S	Support but would expect to be included in discussions over necessary contributions if development is to occur in Godmanchester.	Support noted.	None needed.
Lands Improvement	Lands Improvement	Policy Wording 10	346	S	We support the approach for planning obligations related to the form of the development and its potential impact. The	Support noted. Following consideration of comments substantial rewriting of the	Submission plan amended including amendments to the

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Full Name	Organisation	Rep On	Rep Id	Type	Summary	Officers' Response	Action Taken
Stanton Group Developments Ltd	Stanton Group Developments Ltd	Policy Wording 10	457	S	Community Infrastructure Levy may change the approach to developer contributions depending on the final content of the Government's proposals.	Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority, as well as more detail about the Council's approach regarding CIL.	Infrastructure and Implementation and Monitoring Sections.
Martin Page	DH Barford (agent)	Policy Wording 10	620	O	DCLG document 'Planning Obligations: Practice Guidance' (2006) should be used. Whilst identifying the range of infrastructure facilities and services for which contributions are likely to be sought, the policy does not identify the types of contribution that will be sought. These details should not be in SPDs.	Support noted.	None needed.
Chris Blackman	Cambs CC	Policy Wording 10	489	C	County Council requirements for children & young persons for each part of the District are sent as a separate paper. Principal requirements will be a primary school at Brampton, an additional form of entry for secondary education at Huntingdon, an additional secondary school at St Neots and three forms of entry for primary education, including an extension to the Love's farm school and a new 2FE primary school. At St Ives and Ramsey, there is educational capacity. There is also adequate capacity at Sawtry and Yaxley, but any growth at Fenstanton would require contribution to additional primary capacity.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority.	Submission plan amended including amendments to the Infrastructure and Implementation and Monitoring Sections.
Chris Blackman	Cambs CC	Policy Wording 10	491	C	There will be a need for additional early years/childcare/nursery provision associated with the major growth areas. In other areas, it does not necessarily follow that there is capacity in the early years and childcare sectors. There may	Comments noted. This information is essential and is being utilised in the preparation of the LIF.	Submission plan amended including amendments to the Infrastructure and Implementation and Monitoring Sections.

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Full Name	Organisation	Rep On	Rep Id	Type	Summary	Officers' Response	Action Taken
Chris Blackman	Cambs CC	Policy Wording 10	494	O	be a current deficit that will require developer contributions to either expand existing provision or make new provision  Footpaths and bridleways should be included. This will enable improvements to the network to provide for healthy, sustainable transport for the new community.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority.	Submission plan amended including amendments to the Infrastructure and Implementation and Monitoring Sections.
Chris Blackman	Cambs CC	Policy Wording 10	495	O	Archaeology should be included.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority.	Submission plan amended including amendments to the Infrastructure and Implementation and policy CS10.
Persimmon Homes (East Midlands) Ltd	Persimmon Homes (East Midlands) Ltd	Policy Wording 10	583	S	We support the provision of a standardised charging system, however, in order to comply with the advice in Circular 05/05 Planning Obligations; Contributions will be fairly and reasonably related to the scale and nature of the proposed development, directly related to that development and relevant to planning.	Support noted. Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority including the Council's approach to the CIL.	Submission plan amended including amendments to the Infrastructure and Implementation and policy CS10.
Adam Ireland	Environment Agency	Policy Wording 10	539	S	We continue to support the requirement for developer contributions.	Support noted.	None needed.
John Blackburn	Little Paxton PC	Policy Wording 10	598	C	There is insufficient emphasis on these improvements to be made before or by the time the need arises. There is likely to be an immediate need for education and health care arising from new developments. The aging population raises the need for care of the elderly within the community and leisure facilities for the elderly. There has been significant development recently in Lt Paxton but no additional provision for primary education. More has permission but there is no indication of planned growth to the school.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority including the timing of provision.	Submission plan amended including amendments to the Infrastructure and Implementation and policy CS10.



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Full Name	Organisation	Rep On	Rep Id	Type	Summary	Officers' Response	Action Taken
Paul Seabrook	Seabrook Farms	Policy Wording 10	633	O	Improvements to bus services are needed to maintain Lt Paxton as a Key Service Centre. Improvements to infrastructure must be in place before homes are occupied to avoid grid lock in our towns and the collapse of essential services. Contributions and infrastructure improvements should be considered in parallel with the Spatial Strategy. Several Key Service Centres are seeking infrastructure improvements but are unable to carry them out without contributions from development.	It is recognised that infrastructure improvements may only be possible in KSC with the aid of developer contributions. It will be important to ensure contributions can be secured from development. Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority.	Submission plan amended including amendments to the Infrastructure and Implementation and policy CS10.
Gates Hydraulics	Gates Hydraulics	Policy Wording 10	510	O	We have concerns with whether the policy wording accurately reflects the Government's approach to planning obligations, as set out in Circular 05/2005.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority.	Submission plan amended including amendments to the Infrastructure and Implementation and policy CS10.

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Table 22 Representations on Implementation, Monitoring and the Glossary

Name	Organisation	Para/ Policy	Rep ID	Type	Summary	Officers' Response	Action Taken
Maydo Pitt	Go East	9	44	O	The monitoring and implementation framework needs to be more specific setting out by whom, how and when the vision, objectives and core policies will be delivered. Possible contingency measures should also be included as well as infrastructure requirements of other partners' policies and programmes. A strategic housing trajectory setting out anticipated delivery of housing and broad sources (i.e. existing commitment, urban capacity sites, brownfield allocations, Greenfield sites/urban extensions) is required.	The deficiencies in the infrastructure and implementation sections and the links between them are acknowledged. Work is underway to produce a Local Investment Framework (LIF). The preliminary work for the LIF will inform the Submission Core Strategy and enable greater clarity in the Infrastructure and Implementation sections.	Submission plan amended including Infrastructure and Implementation and the Monitoring sections.
William Evans	Wharf Land Investments	9.1	388	S	Monitoring and review of the various components of the Local Development Framework will be fundamental in order to reflect the changing circumstances both in terms of the Government's future housing targets, eco town programme and overall housing allocation and distribution at a regional and sub regional level.	Support noted. Monitoring and review are essential components of the LDF.	None needed.
Paul Cronk	HBF	9.3	94	C	HDC will need to demonstrate that its housing trajectory is realistic and sites identified are readily available for development.	Comments noted. The housing trajectory will be supported by evidence of the realistic availability of sites.	Submission plan amended including Monitoring Section.
Ian Burns	Cambs PCT	9.4	191	C	Recommend an indicator is included in to capture a measure of social cohesion. For example the new national indicator NI 2: % of people who feel they belong to their neighbourhood.	Inclusion of the suggested indicator will be considered.	None needed.
Mr David Stowell	Spaldwick and Stow Longa PCs	Table 9.1	4	C	Clarify where the "related spatial objectives" originate or include SA objectives draft Final SA report. Targets should be more specific.	It is considered to be clear that the spatial objectives refer to those in the Core Strategy and that the Related SA Objectives refer to those in the Draft Final SA Report.	None needed.

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Name	Organisation	Para/ Policy	Rep ID	Type	Summary	Officers' Response	Action Taken
Mr David Stowell	Spaldwick and Stow Longa PCs	Table 9.1	5	C	Reconsider the indicator "Amount of new residential development within 30 mins public transport time of GP, hospital, primary and secondary schools, areas of employment and a major retail centre" to take into account whether public transport is available for return journeys at appropriate times. No recommendation as to how the indicator should be reworded.	Data on this indicator is collected by Cambs CC. Return journey information would be a valuable inclusion. Changing this indicator should be investigated.	Investigation of amendments will be undertaken however the Submission plan is unchanged.
Tom Gilbert-Wooldridge	English Heritage	Table 9.1	129	O	Building for Life standard indicator is too narrow focusing only on large scale housing development. Include an indicator for measuring the number of permissions granted that adversely affect historic environment.	An indicator as suggested would be very difficult to administer as most development could be considered to adversely affect the historic environment to some extent. Establishing whether an impact is significant would be required and is likely to require detailed professional consideration and survey work.	None needed.
Mr Justin Tilley	Natural England	Table 9.1	326	C	There is no provision for tracking landscape change or recreation and access to greenspace. It should be made clear what the relationship is between the AMR and SA monitoring process.	The areas for monitoring suggested will be considered however it will be difficult to identify appropriate and measurable indicators. Both the AMR and the SA report identify the relationship between the two documents.	Investigation of amendments will be undertaken however the Submission plan is unchanged.
Miss Rachel Pateman	Wildlife Trust	Table 9.1	277	C	More monitoring related to climate change needed eg indicators for amount energy which comes from renewable sources; energy efficiency standards in new homes; and the number of new homes that achieve the EcoHomes Excellent rating.	The indicators suggested will be considered in light of the Code for Sustainable Homes becoming mandatory and the programmed changes in Building Regulations to achieve zero carbon homes by 2016. Renewable Energy generation capacity will be included as an indicator in the Development Control Policies DPD.	None needed.

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Name	Organisation	Para/ Policy	Rep ID	Type	Summary	Officers' Response	Action Taken
Miss Rachel Pateman	Wildlife Trust	Table 9.1	280	C	Only Natural England and HDC have a statutory duty relating to biodiversity although support and advice can be given by other agencies eg RSPB	Comments noted.	None needed.
Mr Philip Raiswell	Sport England	Table 9.1	173	C	Include additional indicator measuring: additional open space, sport and recreation facilities secured through development and other means	Inclusion of the suggested indicator will be considered in the Development Control Policies DPD.	None needed.
Ms Diane Millis	Woodland Trust	Table 9.1	237	C	Include Woodland Access Standard as a performance indicator. This recommends: - that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size - that there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people's homes.	Adoption of the standard will be considered for the Development Control Policies DPD.	None needed.
Chris Blackman	Cambs CC	Table 9.1	480	O	Include the following indicators: - Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality. Objectives 2, 13. (Core output indicator). - Renewable energy capacity installed by type. Objective 12, 13. (Core output indicator) - Per capita CO2 emissions in the LA area. Objective 12, 13. (National Indicator 186). - Trends in travel in the Market Towns of Huntingdon, St Ives and St Neots. Objective 12, 13. (Local output, significant effects). - Area of accessible, informal open space per 1000 people for public use. Objective 9. (Local output, significant effects).	Indicators identified will be included in either the Core Strategy or other DPDs.	Submission plan amended to include number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality included as an indicator in the Monitoring Section.
Chris Blackman	Cambs CC	Table 9.1	481	O	Amend household waste indicator to “% household waste recycled and composted”	Indicator will be amended.	Submission plan amended including amendments to the Monitoring Section.

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Name	Organisation	Para/ Policy	Rep ID	Type	Summary	Officers' Response	Action Taken
Rose Freeman	The Theatres Trust	10	367	S	Simplify explanation of Community Infrastructure to "community facilities provide for the health, welfare, social, educational, leisure and cultural needs of the community."	Support noted. Suggestion accepted.	Submission plan amended including amendments to the Glossary Section.

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Table 23 Representations on Volume Two

Name	Organisation	Para Policy	Rep ID	Type	Summary	Officers' Recommendation	Action Taken
Taylor Woodrow Developments Ltd			21	O	There has been no comparative or logical assessment which determines the preference for one option over another in Vol 2 which informs the development of the Preferred Option. For this reason, the Preferred Option has not taken into account infrastructure delivery expectations and is not sound.	It is acknowledged that the assessment of alternatives was not been made particularly detailed. It is, however, important to recognise that the draft Final SA does assess the alternative approaches identified at the Issues and Options stage and the Final SA assesses those alternatives identified from Preferred Options consultation. This needs to be read in conjunction with the both volumes of the Core Strategy. Further detailson the assessment of alternatives will be incorporated in Volume 2 and the chapter on implementation and infrastructure will be strengthened in volume 1	Submission plan revised to clarify and further explain the assessment of alternatives in volume 2.
Gates Hydraulics	Gates Hydraulics		16	S	Agree with the contents of the spatial vision, in particular the requirement for development to be undertaken in a sustainable manner which respects, maintains and enhances the special characteristics of the towns, villages and countryside of Huntingdonshire. Greenfield land should therefore be avoided.	Support noted.	None needed.
Persimmon Homes (East Midlands) Ltd		5	17	O	The Core Strategy is unsound as it fails to consider Paragraph 24 of the addendum report to PPS1: Planning and Climate Change (December 2007), PPG13: Transport and paragraph 5.69 of the EEP Panel Report which all require the consideration for access by sustainable travel modes and make use of existing infrastructure. Furthermore, the EEP Panel Report makes no reference to major development at St Neots and the level currently proposed for the town does not conform to the draft RSS. Growth should be focused around the Huntingdon Urban Area, thus making the most effective use of the Guided Busway and East Coast Main Line, and other planned public transport improvements arising from existing planned development. Growth in Godmanchester on the scale proposed is unsustainable and unviable as it relies on A14 road improvements and does not make good use of existing transport	The supplement to PPS1 was published after the Preferred Options and therefore will be reviewed and taken into account for Submission. Work is underway to ensure that the submission strategy is the most sustainable and that implementation of required infrastructure is both sufficiently funded and delivered when necessary. It should be noted however that whatever the EEP panel report states (or not) the District has to take into account the EEP as it is currently drafted and so long as conformity is maintained, is free to determine the best strategy for the plan period.	Submission plan revised to strengthen Implementation and Infrastructure chapter.

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Name	Organisation	Para Policy	Rep ID	Type	Summary	Officers' Recommendation	Action Taken
Taylor Woodrow Developments Ltd		5	20	0	<p>infrastructure. The designation of mixed development at Brampton should not be included in the Core Strategy until the lifespan of the base is decided. The SA and evidence base needs to prove Ramsey is a suitable location for mixed use development. It would be more sustainable to locate development on Greenfield sites that would be well served by the guided busway, rather than locating development on brownfield sites that will inevitably encourage lengthy journeys made by the private car.</p> <p>The Preferred Options does not set out any clear framework for the testing of the plan, for its monitoring and to deal with what PINS describes as the 'what if' scenario. It appears to be reliant on a number of factors for which no clear information is as yet available that would guarantee that the plan can be implemented. The inclusion of housing and infrastructure trajectories would clarify the choice of location and broad phasing of development proposed. The issues that are likely to be pertinent to delivering the strategy include:</p> <ul style="list-style-type: none"> <li>- The A14 southern bypass, its timing, the provision of junctions and the extent to which development can be commenced or completed in advance of its provision</li> <li>- The delivery of A428 improvements between St Neots and Caxton Gibbet</li> <li>- The release of RAF Brampton following closure</li> <li>- Flood risk assessment</li> <li>- Community infrastructure provision, particularly secondary education provision, and the mechanisms for its funding and delivery.</li> </ul> <p>Infrastructure assessment should have regard to services and community provision such as schools and should set out what will be necessary to provide and how they are to be delivered.</p>	<p>This raises a number of pertinent issues that will need to be resolved before the strategy can be finalised. Following consideration of comments substantial rewriting of the infrastructure section is considered to be necessary. The need for inclusion of a housing trajectory is accepted. Following receipt of initial work towards the LIF further details on infrastructure requirements can be incorporated into the submission document.</p>	<p>Submission plan revised to strengthen the Implementation and Infrastructure chapter and include a housing trajectory in the Monitoring Chapter.</p>

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Name	Organisation	Para Policy	Rep ID	Type	Summary	Officers' Recommendation	Action Taken
Mr S Ross	Swan Hill Homes Ltd		9	S	Option 15 is Supported. Development in the Key Service centres should be tailored to respond to the circumstances of each of the centres. Yaxley is particularly well related to Peterborough and therefore is a more sustainable location to accommodate growth than other KSC that do not have a close relationship with higher order centres.	Option 15 was included along with the issues, options and questions that formed part of consultation at earlier stages. These were intended to show the range of options considered previously and were not part of what was being considered at this stage. Although option 15 has been taken forward to some extent, the Council considers that a greater consideration for the Core Strategy is maintaining a strategy that is strategic and does not prescribe smaller scale allocations. The Key Service Centres are considered suitable for moderate scale development. Sites capable of moderate scale development will be considered following continued monitoring of delivery, and where appropriate will be allocated in the Planning Proposals DPD.	None needed.
Mr S Ross	Swan Hill Homes Ltd		14	S	Map 5.7 is Supported. Development in Direction AA could be sustainable and would not risk the coalescence of the settlement with The Hamptons or Peterborough.	Map 5.7 was included along with the issues, options and questions that formed part of consultation at earlier stages. These were intended to show the range of options considered previously but was not part of what was being considered at this stage. The Council considers that an important consideration for the Core Strategy is maintaining a strategy that is strategic and does not prescribe smaller scale allocations. The Key Service Centres are considered suitable for moderate scale development. Sites capable of moderate scale development will be considered and where appropriate allocated in the Planning Proposals DPD.	None needed
Mr S Ross	Swan Hill Homes Ltd	5.3	3	S	Support. It is a cornerstone of sustainability to ensure that development is located where services and facilities are available and where development could contribute to reducing the need to travel. Eg Yaxley benefits from a close physical and functional relationship with Peterborough and the Hamptons and benefits from good public transport services.	Support noted. Yaxley does have attributes that mean it is sustainable to some extent, which is recognised by its designation as a Key Service Centre.	None needed



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Mr S Ross	Swan Hill Homes Ltd	5.7	4	S	Further development in the Key service centres will contribute to improving their internal sustainability and local services and facilities.	Support noted.	None needed
Mr S Ross	Swan Hill Homes Ltd	Table 5.5	13	O	Whilst a truly dispersed strategy might conflict with sustainable development. A strategy which provides for modest development in the Key Service Centres in addition to the majority at locations such as Huntingdon, would provide a more 'balanced' strategy than the levels of development currently set out in the draft Core Strategy. A higher level of development is considered appropriate for Yaxley because of its relationship with Peterborough and the Hamptons. An allocation of 500 dwellings is more appropriate including 1 or more peripheral Greenfield sites.	The preferred strategy allows for modest development in Key Service Centres. Given the amount of housing development for the district it is considered that 500 would be inappropriate for Yaxley, especially if this meant significant use of greenfield sites.	None needed
Mr S Ross	Swan Hill Homes Ltd	5.14	5	O	Whilst a truly dispersed strategy might conflict with sustainable development. A strategy which provides for modest additional development in the Key Service Centres in addition to the majority of development at locations such as Huntingdon, would provide a more 'balanced' strategy than currently set out in the draft. A higher level of development is considered appropriate for Yaxley because of its physical and functional relationship with Peterborough and the Hamptons. An allocation in the region of 500 dwellings would be more appropriate, including 1 or more peripheral greenfield sites.	The preferred strategy allows for modest development in Key Service Centres. Given the amount of housing development for the district it is considered that 500 would be inappropriate for Yaxley, especially if this meant significant use of greenfield sites.	None needed
Paul Seabrook	Seabrook Farms		19	O	Vol. 2 - Option 29 In response to question 34, we strongly request that all Key Service Centres are allocated some form of growth. The allocation of new development to these Key Service Centres, (employment or housing), is essential in strengthening settlement vitality and viability, becoming more self-contained and reducing the need of residents to travel outside of their village in order to access important services and facilities. The level of growth should be in proportion with the size of the settlement, and the level of services and facilities found within. The scale of development should be sufficient	Question 34 was included along with the issues, options and questions that formed part of consultation at earlier stages. These were intended to show the range of options considered previously and were not part of what was being considered at this stage. Although the decision to allow growth in Key Service Centres has been taken forward to a great extent, it is considered that a greater consideration for the Core Strategy is maintaining a strategy that is strategic and does not prescribe smaller scale allocations. The Key Service Centres are considered suitable for moderate scale	None needed

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Name	Organisation	Para Policy	Rep ID	Type	Summary	Officers' Recommendation	Action Taken
Mr S Ross	Swan Hill Homes Ltd	5.19	6	O	The absence of a 2 tier identification of Key Service Centres in the East of England Plan does not necessarily preclude the Council from using such a system. Draft East of England plan policy CSR 1 acknowledges that development may take place on the peripheries of the identified key service centres.	It is not considered appropriate to make such a distinction between Key Service Centres, however some housing development has been identified as suitable in key service centres where this accords with the overall strategy to concentrate growth in the Huntingdon and St Neots Spatial Planning Areas and the Cambridge Sub Region.	None needed
Mr S Ross	Swan Hill Homes Ltd	5.35	7	C	The 'alternative' of including a distinction between 2 categories of Key Service Centres, based on their capacity to accommodate development and sustainability considerations, would be Supported.	Although this alternative was considered reasonable the Council has decided that a single category of Key Service Centre is the best approach. Further details on the assessment of alternatives will be incorporated into Volume 2.	Submission plan revised to strengthen and clarify the Council's assessments of alternatives in volume 2.
Mr S Ross	Swan Hill Homes Ltd	5.43	8	O	Including a distinction between 2 categories of Key Service Centres would be Supported. The fact that the East of England plan does not specifically include this does not preclude the council from considering this option. Even without the inclusion of a 2 category system it is still possible to allocate a different quantum of development to each of the Key Service Centres, taking into account their location, local needs and sustainability merits.	Although this alternative was considered reasonable the Council has decided that a single category of Key Service Centre is the best approach. Further details on the assessment of alternatives will be incorporated into Volume 2.	Submission plan revised to strengthen and clarify the Council's assessments of alternatives in volume 2.
Persimmon Homes (East Midlands) Ltd			18	S	Agree with the provision of affordable housing identified by Policy Wording 4 of the Core Strategy Preferred Options. However, the level of affordable housing required should be based on an up to date, robust strategic housing market assessment and other surveys that assess the local need.	Support noted. The SHMA is currently in draft form and will be completed prior to Submission of the Core Strategy. The level of affordable housing sought will be based on the SHMA, previous needs assessment and the draft EEP.	Submission plan revised to reference completed Cambridge sub region SHMA and

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Mr S Ross	Swan Hill Homes Ltd		10	C	The inclusion of an affordable housing target of 40% is not objected to provided robust provenance can be demonstrated to support this.	It is considered that the combination of SHMA, Needs assessment and requirements from the EEP are sufficient to justify seeking 40% affordable housing provision.	Peterborough SHMA where relevant.  The reasoned justification has been strengthened, in particular to include reference to the SHMA
Mr S Ross	Swan Hill Homes Ltd		11	S	Option 31 would be preferred as it properly reflects the advice on thresholds set out at paragraph 29 of PPS 3.	Option 31 was included along with the issues, options and questions that formed part of consultation at earlier stages. These were intended to show the range of options considered previously and were not part of what was being considered at this stage.	None needed.
Mr S Ross	Swan Hill Homes Ltd		12	O	It is considered that thresholds below 15 dwellings should not be included in the core strategy as insufficient justification has been demonstrated to support such an approach. Lower thresholds would discourage development of smaller sites. This would have a negative effect on the ability of the Council to meet its strategic housing requirement.	The District's housing requirements are not dependant on small sites as these are mostly windfall sites and therefore not considered in the housing delivery calculations.	None needed.
Mr Michael Palmer-Asplin			2	C	Volume 2 of the Core Strategy Preferred Options para 5.81 is unduly pessimistic regarding suitable employment land east of St Ives. Some of the potential is indeed in the flood risk area, but land is available on higher ground north of the A1123 (actually in Holywell-cum-Needingworth parish, the western part adjoining existing employment uses).	The Council is not convinced of the need to identify additional land for employment uses in St Ives as identified in the Employment Land Review which provides robust evidence to underpin this policy. However, it is recognised that this may have to be reviewed depending on results of monitoring.	None needed.
Ms Diane Millis	Regional Policy Officer Woodland Trust	Table 6.1	15	C	Additional documents should be used as source material for the Core Strategy. Reference should be made to the Regional Woodland Strategy for the East of England - Woodland for Life (EERA/FC, 2003). The Core Strategy should also take account of Planning Policy Statement: Planning and Climate Change Supplement to Planning Policy Statement 1 (DCLG, 2007).	The Core Strategy is intended to be a high level strategic document in which such specific targets are inappropriate. The document Woodlands for Life will be considered in more detail when preparing the Development Control Policies DPD. The documents referenced will be reviewed for production of the Submission Core Strategy.	The Woodland Strategy will be considered when preparing the Development Control Policies DPD.

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Name	Organisation	Para Policy	Rep ID	Type	Summary	Officers' Recommendation	Action Taken
Mr Gary Parsons	Planning Liaison Account Manager Anglian Water Services Ltd	7.5	1	O	Without a water cycle study/strategy, the environment's ability to sustain the proposed development is unproven in terms of wastewater discharges.	A water cycle study will be prepared for submission.	Submission plan revised to strengthen Implementation and Infrastructure Chapter and include relevant information from the Water Cycle Study.